



# **2019 ANNUAL ACTION PLAN**

**City of Milwaukee, Wisconsin**

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To be submitted to the  
U.S. Department of Housing & Urban Development  
By the  
Community Development Grants Administration  
City Hall – 200 East Wells Street; Room 606  
Milwaukee, Wisconsin  
Steven L. Mahan, Director

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Funds Provided by the U.S. Department of Housing & Urban Development

Amended on May 9, 2020 to add ESG CARES Act, CDBG CARES Act, HOPWA CARES Act Funds to the FY2019 Annual Action Plan. Amended July 16, 2021 to add ESG Cares 2 Act and CDBG 3 Cares Act.

## **Executive Summary**

### **AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)**

#### **1. Introduction**

The Community Development Block Grant program was established by Congress in 1974 with the passage of the Housing and Community Development Act. This program provides funds to municipalities and other units of government around the country to develop viable urban communities. This is accomplished by providing affordable, decent housing, a suitable living environment and by expanding economic opportunities principally for low and moderate income persons. Local units of government develop their own programs and funding priorities, however all activities must be consistent with one or more of the following HUD national objectives:

- **Principally benefits low/moderate income persons**
- **Prevents or eliminates slum or blight**
- **Addresses an urgent need or problem in the community (e.g., natural disaster)**

As a Participating Jurisdiction (PJ) and entitlement community, the City of Milwaukee-Community Development Grants Administration (CDGA), receives annual funding allocations from the Federal government to fund activities to address these National Objectives. As a recipient of these funds, the City of Milwaukee is required to submit to HUD every five years, a Consolidated Plan and Strategy that defines the direction the City will take in utilizing these Federal funds to address the national objectives in a manner that will produce the greatest measurable impact on our community.

For the most part the Consolidated Plan is focused on how to best spend Federal HUD dollars. There is little discussion on the need for quality schools, government expenditures for human services or on the role of personal responsibility for life decisions, which impact economic viability. While those are all key issues, they are not within the scope of the Consolidated Plan for the City of Milwaukee's use of Federal funds. While the Consolidated Plan does not directly address these issues as strictly defined, many of the programs funded by the Community Development Grants Administration, (CDGA) have an impact on these concerns and more importantly, bring value to Milwaukee's diverse neighborhoods. The City of Milwaukee, Community Development Grants Administration will continue to strive to address the needs of Milwaukee's residents, while promoting programs and activities that will provide the greatest benefit for our community.

The priorities and accomplishment goals outlined in this document are based on assumptions about future funding levels for the Consolidated Plan programs. In all cases, the City of Milwaukee has presumed the level of funding of each program based on previous annual funding levels. Because these programs are subject to potential changes due to national funding decisions, the projections and planned activities are subject to change based on the availability of funding. The strategies and recommendations outlined in the document attempt to balance the needs and priorities of our community and as identified in the data analysis, with the availability of funds.

## **Updated Citizen Participation**

### **Citizen Participation Process**

In accordance with the regulations of the U.S. Department of Housing and Urban Development and in an effort to ensure adequate and accessible citizen participation the City of Milwaukee annually solicits the input and participation of citizens and interested parties.

**In 2017, CDGA provided copies of the 2018 Funding Allocation Plan to interested citizens and other stakeholders to solicit community/resident feedback. Citizens were able to comment on the Plan from *June 30, 2017 through July 31, 2017*. CDGA advertised the public hearings through newspapers, mailings, e-mail, telephone calls, City website and word of mouth. The Common Council City Clerk's Office advertised and posted public notices for the hearings.**

Although, the City already satisfied the requirement of citizen participation, due to a substantial increase in additional federal funds (outlined below), the City of Milwaukee looks to solicit community/resident feedback on the revised 2018 Annual Action Plan.

The City of Milwaukee allowed 30 additional days for citizen input on the revised 2018 Annual Action Plan. Citizens were able to comment on the Plan from *May 7, 2018 through June 5, 2018*. Additionally, a special public hearing was held by the Community & Economic Development Committee on June 18, 2018.

### **Additional Federal Funds**

## 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The Community Development Grants Administration has defined a Housing and Community Development 5-Year Strategy which focuses on creating viable neighborhoods and providing decent housing and economic opportunity for all community residents. This community vision recognizes that housing is a critical part of a viable neighborhood system, which also includes public safety, education, employment opportunities, business development and social service providers. These priorities represent a comprehensive approach to neighborhood vitality, housing availability and affordability for all residents and adding value to the community.

To achieve these goals, CDGA will continue planned aggressive blight elimination efforts, support active citizen participation in monitoring problem properties and organizing efforts to improve quality of life issues and encourage the economic integration and revitalization of neighborhoods. Other priorities include integrating crime prevention into a variety of city services and capital improvements, expanding the city's aggressive efforts to combat lead hazards and continuing to support City efforts to eliminate graffiti.

The City's **Anti-Poverty Strategy** emphasizes jobs and job creation. City departments have utilized a variety of tools to work cooperatively with the non-profit sector and the business community to leverage employment and economic activity in targeted areas of the city and to spark broader policy and programmatic reform to focus on jobs

The City's **Economic and Community Development Strategy** compliments its Anti-Poverty strategy by emphasizing the interrelationships and the need for the expansion of opportunities in the areas of education, employment, economic development and housing. In terms of targeting resources, Milwaukee continues its commitment to cluster developments and large impact developments. In this vein, there is a growing sense that public and private sector funding should be focused more on tangible outcomes leading to neighborhood revitalization and the creation of jobs, income and wealth. This model of comprehensive planning is embraced by the residents of the target areas as the emphasis is focused on housing improvement, job creation and income enhancement.

### Housing Strategy

The City of Milwaukee's **Housing Strategy** includes expanded homeownership opportunities and access to affordable housing for all residents, the elimination of blighted structures, the sale and redevelopment of vacant lots, housing rehabilitation and new housing construction for sale to owner-occupants and affordable rental housing for large families, persons with special needs and the

elderly. The City also proposes to repair owner-occupied structures and substantially rehabilitate units for eventual homeownership.

Other priorities include expanding efforts to assist public housing and Section 8 residents move to private market unsubsidized housing, provide better training, advocacy and mediation services for landlords and tenants and increase the number of rent-assisted housing units and their geographic distribution throughout the metropolitan area and Milwaukee County. The City's objectives to address these issues include placing households in either Section 8 or public housing units as turnover occurs and substantially rehabilitate rental units through the Rent Rehabilitation program.

Persons with special needs as well as the disabled and homeless are an important concern for the City as they strive to bring value to neighborhoods. The Milwaukee Continuum of Care 10 Plan to End Homelessness, details the strategies, goals and action steps to be undertaken and priority needs and allocation priorities as determined by the Milwaukee Continuum of Care (CoC) Planning group. Some of the specific goals of this group include, coordinating the expansion of permanent housing and supportive services options, increasing access to permanent housing and enhancing current data and information systems.

Additionally, the City places an emphasis on addressing the needs of the mentally ill and veterans, youth issues such as dropout rates, recreation, educational programs and employment and overall unemployment issues. Housing and supportive services for persons with Aids and other disabilities are another priority for the City of Milwaukee as well as continuing to monitor the impact of the Wisconsin Works (W-2) programs for Milwaukee's residents.

Lead-based paint hazards and their abatement continue to be a high priority for the City of Milwaukee. To that end, the following strategies are being utilized including: continuous evaluation of lead abatement methods, continuation of a program of grants/loans to assist homeowners and landlords in removing lead hazards, continuing collaborative efforts with other housing programs to identify lead abatement and lead hazard reduction into total housing rehabilitation, expanding education and training for homeowners, landlords and tenants regarding lead poisoning prevention and securing city, state and federal funding to finance lead hazard reduction activities.

### **Additional Strategies**

Other priorities include expanding efforts to assist public housing and Section 8 residents move to private market unsubsidized housing, provide better training, advocacy and mediation services for landlords and tenants and increase the number of rent-assisted housing units and their geographic distribution throughout the metropolitan area and Milwaukee County. The City's objectives to address these issues include placing households in either Section 8 or public housing units as turnover occurs and substantially rehabilitate rental units through the Rent Rehabilitation program.

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The City's **Public Housing Improvement Strategy**, formulated in conjunction with the Consolidated Plan, notes the following strategies for its residents including: efforts to provide opportunities for resident participation through economic development programs, home ownership programs and supportive services offered through drug elimination grants and economic development and supportive services (ED/SS) grants at all its public housing developments. Residents are also directly involved in the evaluation of program outcomes and in the determination of the level of satisfaction with facilities and services offered by the Housing Authority. Other initiatives include the Housing Authority's commitment to expand their efforts to assist public housing and Section 8 residents to move to private market unsubsidized housing and the portability of residents who wish to relocate to other communities outside the city.

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

As required by HUD, a Consolidated Annual Performance and Evaluation Report (CAPER) is submitted to HUD following the end of each program year which ends on December 31st. The CAPER provides an actual account of activities, accomplishments and expenditures, which occurred during the previous program year.

In 2018, approximately **\$11.5** million in Community Development Block Grant (CDBG) and HOME entitlement dollars was allocated for direct housing and housing-related activities, including owner-occupied housing rehabilitation, acquire/rehab/sell, vacant and blighted homes, new home construction, rental rehabilitation, lead abatement and other categories. This resulted in the completion of direct housing and/or rehab activities. Other housing-related activities resulted in the following: homebuyer counseling programs assisted *first-time* low-income homebuyers in closing home mortgage loans, property units received graffiti abatement, landlords received training on effective property management and various types of tenant assistance, including tenant training, were provided to community residents.

In 2018, CDBG funds were allocated to anti-crime community development and quality of life related activities including: community organizing and crime prevention, employment services, youth programming, health services, safe havens, driver's license recovery, infant mortality initiatives and community prosecution activities.

The 2018 accomplishments related to anti-crime activities involved residents in: resident meetings and neighborhood improvement efforts such as cleanups, establishing new block clubs, and identifying hot spots, (drug houses or nuisance properties) which were referred to the appropriate authorities for action through the Community Prosecution program. In addition, thousands of youth benefited from a variety of youth employment, educational and recreation initiatives. These varied organizing efforts correlate with the five-year strategy of the Consolidated Plan of increasing resident participation to improve the overall quality of life for residents.

CDBG-funded **Job Training and Placement** and **Job Placement** activities assisted low income persons in obtaining employment and the **Special Economic Development** initiatives led to the creation of new jobs. The Milwaukee Economic Development Corporation Revolving Loan fund continued servicing existing loans for continued job creation.

In 2018, CDBG and ESG funding were allocated for mandated and essential services such as homeless shelters and domestic violence prevention programs. Funds were also allocated to city-wide services including: fair housing, graffiti abatement and landlord/tenant programs. In addition, community-based organizations received technical assistance to help strengthen their administrative capabilities and promote efficient services to the residents they serve. Enforcement services were provided to clients to resolve housing and lending discrimination complaints.

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

**Lead Agency:** The agency responsible for oversight and monitoring of these Federal funds and ensuring that these activities are implemented is the Community Development Grants Administration. The oversight body for CDGA is the City of Milwaukee Community and Economic Development Committee

(CED) of the Milwaukee Common Council. All actions taken by the Committee are ratified by the Milwaukee Common Council and the Mayor. CDGA annually solicits and evaluates applications from all interested parties through an open and competitive Request for Proposal (RFP) process. The funding categories for the RFP process receive input from the community at large and are finalized by the CED Committee and Mayor. Recommendations for annual funding are made to the Community and Economic Development Committee for approval with final ratification by the Milwaukee Common Council and Mayor.

In accordance with the regulations of the U.S. Department of Housing and Urban Development and in an effort to ensure adequate and accessible citizen participation, the City of Milwaukee adopted a Citizen Participation Plan, which was reviewed and approved by the Common Council of the City of Milwaukee on April 23, 1991. The plan outlines the procedures and processes used by the City to solicit citizen input and has since been updated and revised. The document was subsequently submitted and approved by HUD.

The City's Citizen Participation Plan requires public hearings to obtain citizen input on funding proposals and inquiries at all stages of the community development program, including the Consolidated Plan and Annual Funding Allocation Plan (FAP) and review of proposed activities and program performance. The FAP is meant to define the City's community development needs and funding priorities as it relates to the use of Federal funds. Essentially, the FAP is the basis for the Request for Proposals process. The FAP is reviewed annually through public hearings and amended where appropriate, as needs within the community change. Broad-based citizen and community input by stakeholders is strongly encouraged and solicited. Over the years, the City of Milwaukee has used its Federal entitlement funds to creatively respond to community needs and to enable neighborhood residents, businesses and other community stakeholders to achieve the highest possible quality of life. Community-based organizations are essential to these goals for responding to community needs and for strengthening the social and economic infrastructure of Milwaukee's neighborhoods and their efforts are also coordinated with City agencies which have the same mission. Relative to the allocation of funds, the City of Milwaukee places the highest priority on those programs which directly serve low and moderate income persons (defined as those with incomes of 80% or less of Milwaukee's median income). Priority is also given to those projects which serve residents of the Neighborhood Revitalization Strategy Areas (NRSAs), of which at least 70% of all residents are considered low income.

#### **City's Notification Requirement Regarding Draft Plan Availability**

A notification will be advertised in a minimum of two local newspapers of general circulation to inform the public that a draft Consolidated Plan, or draft Annual Action Plan is available to review and subject to public comment. The notification will describe the contents and purpose of the particular plan. The notice will also be posted on the City's website ([www.milwaukee.gov/cdbg](http://www.milwaukee.gov/cdbg)).

The public notice will state that copies of the particular Plan will be available for review on the City's website, City libraries, the City's Legislative Bureau and the offices of CDGA. Physical copies will also be



available upon request. The City will make the Plan(s) public, and upon request in a format accessible to persons with disabilities. The City will provide citizens a reasonable opportunity to comment on the Plan, and on any amendments to the Plan as defined by this Citizen Participation Plan. The City will consider any comments or views of citizens received in writing, or orally, at any of the public hearings, or during the 30-day public review and will address those comments in the Plan. In preparation of the final Consolidated Plan, or Annual Action Plan, the City will include any written or oral comments on the plans in the final submission to HUD.

### **Performance Reports**

Further citizen involvement is affected by the provision of Accomplishment Reports that identify the annual goals of each program funded and the status of the activities at each quarterly reporting period. This allows concerned citizens and other stakeholders the opportunity to determine if program operators working in their planning areas are delivering the services as funded.

As required by HUD, a Consolidated Annual Performance and Evaluation Report (CAPER) was submitted to HUD by March 31st following the end of the program year which ends on December 31st. The CAPER provides an actual account of activities, accomplishments and expenditures, which occurred during the previous program year.

The City will publish a notice in at least two local newspapers regarding the availability of the CAPER, which will begin the 30-day review and comment period. The notice and the draft CAPER will also be made available to the public via the City's website, City libraries, Legislative Reference Bureau, CDGA offices and to interested persons who request a copy of the report.

Upon completion of the CAPER and prior to its submission to HUD, the City will make the report available to the general public for a (30) day review and comment period. Any comments received from the general public will be included in Final CAPER submitted to HUD.

The Community & Economic Development Committee will hold a hearing on the CAPER. Each public hearing notice will include the availability of an interpreter if requested by non-English speaking or hearing-impaired persons that expected to participate at the hearing.

### **Citizen Participation on 2019 Annual Action Plan**

The Community Development Grants Administration sponsored several public hearings to solicit the input of stakeholders on funding priorities. It should be noted that the planning and implementation process is an ongoing, funded activity conducted by each of the coordinating agencies. Monthly reports are submitted to CDGA detailing citizen and stakeholder planning and action on issues relating to identified long term outcomes.

In addition, performance measurement outcome reports and supporting data are submitted by each coordinating agency. For the 2019 program year, the following public hearings were held to solicit citizen input on the Year 2019 Funding Allocation Plan, which outlines the range of activities that may be undertaken, the amount of federal funds available and any significant program changes. The public hearings were conducted by members of the Community and Economic Development Committee, the official oversight body for Federal grant funds.

#### **Public Hearing Dates on 2019 Funding Allocation Plan**

- 1) Monday, July 16, 2018, Milwaukee Asian Market; 6300 N. 76th Street, Milwaukee, WI. 6:00-8:00 pm
- 2) Tuesday, July 17, 2018, Mitchell Street Library; 906 Mitchell Street, Milwaukee, WI. 6:00-8:00 pm
- 3) Wednesday, July 18, 2018; City Hall, 200 East Wells Street, Room 301-B, 1:30 pm

CDGA provided copies of the 2019 Funding Allocation Plan to interested citizens and other stakeholders to solicit community/resident feedback. Citizens were able to comment on the Plan from June 30, 2018 through July 31, 2018. CDGA advertised the public hearings through newspapers, mailings, e-mail, telephone calls, City website and word of mouth. The Common Council City Clerk's Office advertised and posted public notices for the hearings. In addition, the City included in all advertisements that it would accommodate the needs of disabled individuals through sign language interpreters or other auxiliary aids.

All public hearings were held at times and locations convenient to citizens, potential and actual beneficiaries, community-based agencies and other interested parties, with accommodations provided for persons with disabilities. These public hearings were held in the evenings and at locations in the community that are accessible for persons with disabilities. The public hearings were well publicized through newspaper notices, including Spanish language papers. In addition, two of the meetings were held at agencies that are located in neighborhoods with a majority of African American, Hispanic and non-English speaking persons.

The Year 2019 activities and service providers were approved by the Community and Economic Development Committee on November 15, 2018, and approved by the Milwaukee Common Council on November 27, 2018 and ratified by the Mayor.

Copies of the 2019 Annual Action Plan are on file at the CDGA offices, the City's website, the Milwaukee Public Library system and the City's Legislative Reference Bureau. In addition, the plan was made available to all currently funded community-based organizations, interested parties on CDGA's mailing list, all neighborhood strategic planning agencies, public officials, City departments and others who requested a copy of the document.

#### **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

As stated, CDGA held several public hearings on the Plan. Several citizens and representatives from non-profit agencies spoke regarding the following: youth services funding, job creation, small business assistance, housing, community organizing, and anti-crime initiatives. No comments were provided in writing.

#### **6. Summary of comments or views not accepted and the reasons for not accepting them**

There were no comments that were not accepted on the Plan.

#### **7. Summary**

It should be noted that CDGA strives for increased citizen input and comments in connection with federally funded activities. The City has consistently prepared “drafts” of the Annual Funding Allocation Plan, the Consolidated Annual Performance and Evaluation Plan (CAPER) and previous Consolidated Plans which cover the City’s Community Development Program. Additionally the Community Development Grants Administration held multiple public hearings to obtain citizen input on the Year 2019 Funding Allocation Plan. Copies of the CAPER, Annual Action Plan and Consolidated Strategy and Plan are on file with the Milwaukee Public Library System, the CDGA offices and the Legislative Reference Bureau.

## PR-05 Lead & Responsible Agencies – 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role		Name	Department/Agency
CDBG Administrator		MILWAUKEE	Community Development Grants Administration
HOPWA Administrator		MILWAUKEE	Community Development Grants Administration
HOME Administrator		MILWAUKEE	Community Development Grants Administration
ESG Administrator		MILWAUKEE	Community Development Grants Administration

**Table 1 – Responsible Agencies**

### Narrative (optional)

**Lead Agency:** The agency responsible for oversight and monitoring of these Federal funds and ensuring that these activities are implemented is the Community Development Grants Administration. The oversight body for CDGA is the City of Milwaukee Community and Economic Development Committee of the Milwaukee Common Council. All actions taken by the Committee are ratified by the Milwaukee Common Council and the Mayor. The CDGA solicits and evaluates applications from all interested parties through the open and competitive Request For Proposal (RFP) process. Recommendations for funding are made to the Community and Economic Development Committee for approval with final ratification by the Milwaukee Common Council and Mayor.

### Consolidated Plan Public Contact Information

Steven L. Mahan, Director, Community Development Grants Administration, City of Milwaukee, Wisconsin

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

The City of Milwaukee conducts numerous activities in coordination with various units of government including Milwaukee County, the State of Wisconsin and the jurisdictions of West Allis and Cudahy. Activities include: shelter, joint cooperation on a County-wide Analysis of Impediments study for the entire Milwaukee County region and affordable housing projects.

**Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))**

#### **Public Private Partnerships**

1. Zilber Initiative (\$50 million, 10-year Neighborhood Initiative to revitalize poverty-stricken Milwaukee neighborhoods)
2. City of Milwaukee/Milwaukee County Continuum of Care(CoC)
3. Mayor Tom Barrett and the City of Milwaukee Common Council Strong Neighborhoods Plan (\$11 million per year 2014-2018 to diminished the effects of mortgage and property tax foreclosure)
4. Environmental sustainability – City & community partners on HomeGrown
5. Me2 Program( Energy Efficiency Program to help homeowners and businesses make their properties more energy efficient)
6. Local Initiatives Support Corporation (LISC) [\$25 million over the next five years] non-profit that focuses on community development, leveraging private capital and increasing economic activity
7. Greater Milwaukee Foundation (Healthy Neighborhoods Initiative)
8. Housing partnerships – Habitat For Humanity, Housing Authority City of Milwaukee (HACM)
9. City partnerships –Southeastern Wisconsin Regional Planning Commission (SEWRPC)
10. Milwaukee 7 (regional, cooperative economic development consortium)
11. Lead abatement – trainees learn effective lead-safe work practices while addressing lead hazard issues affecting City residents
12. Collaborations with State agencies such as: WHEDA (Low Income Housing Tax Credits); City tax levy for Housing Trust Fund Projects which is leveraged with HOME funds, bank financing and private developer funds/assets
13. Collaborations with Milwaukee County government on Fair Housing/Analysis to Impediments Study
14. City’s Housing Trust Fund collaborates with numerous housing providers
15. Community Relations-Social Development Commission (SDC), Milwaukee County’s designated Community Action Agency (CAA) whose mission is “Empowering Milwaukee County residents with the resources to move beyond poverty”

16. Employ Milwaukee (formerly Milwaukee Area Workforce Investment Board, Inc.) whose mission is to build a workforce development system
17. The MAWFA (Milwaukee Area Workforce Funding Alliance) employer-driven consortium of private and public funders of workforce development dedicated to increasing the Milwaukee region's employment environment

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The mission of the City of Milwaukee and Milwaukee County Continuum of Care(CoC) is to organize people and resources to end homelessness in Milwaukee. The City of Milwaukee is the lead support agency providing staff to the various committees and workgroups that constitute the CoC. The CoC is comprised of several volunteer committees and networking/task force groups which have various roles and responsibilities to fulfill the mission of the CoC. In addition, the CoC has established numerous partnerships with local and regional entities with expertise in developing, operating and maintaining permanent housing for homeless persons. Decisions are made by the CoC on the allocation of ESG funds, performance standards and outcomes, and policies and procedures for the administration of HMIS.

The State of Wisconsin Department of Administration-Division of Housing, serves as the Homeless Management Information System(HMIS) administrator, responsible for the maintenance, oversight, security and information contained therein. As the HMIS Lead Agency for the CoC, the Department of Administration assesses current reporting needs, trains agency system users, leads the *Point-In-Time* process and provides required HUD reports.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The mission of the City of Milwaukee and Milwaukee County Continuum of Care(CoC) is to organize people and resources to end homelessness in Milwaukee. The City of Milwaukee is the lead support agency providing staff to the various committees and workgroups that constitute the CoC. The CoC is comprised of several volunteer committees and networking/task force groups which have various roles and responsibilities to fulfill the mission of the CoC. In addition, the CoC has established numerous partnerships with local and regional entities with expertise in developing, operating and maintaining permanent housing for homeless persons. Decisions are made by the CoC on the allocation of ESG funds, performance standards and outcomes, and policies and procedures for the administration of HMIS.

The State of Wisconsin Department of Administration-Division of Housing, serves as the Homeless Management Information System(HMIS) administrator, responsible for the maintenance, oversight, security and information contained therein. As the HMIS Lead Agency for the CoC, the Department of Administration assesses current reporting needs, trains agency system users, leads the *Point-In-Time* process and provides required HUD reports.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	THE WISCONSIN WOMEN'S BUSINESS INITIATIVE CORPORATION
	<b>Agency/Group/Organization Type</b>	Small Business Financing
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2018 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector. Specific input was given on the need to increase access for revolving loan funds.
2	<b>Agency/Group/Organization</b>	MILWAUKEE CAREERS COOPERATIVE
	<b>Agency/Group/Organization Type</b>	Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Employment Services
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2018 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.
3	<b>Agency/Group/Organization</b>	Department of Administration -Office of Small Business Development
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development



	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2018 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector. Specific input was given on the need to increase access for revolving loan funds.
4	<b>Agency/Group/Organization</b>	SAFE AND SOUND, INC.
	<b>Agency/Group/Organization Type</b>	Services-Anti Crime
	<b>What section of the Plan was addressed by Consultation?</b>	Crime Prevention
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2018 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.
5	<b>Agency/Group/Organization</b>	Metropolitan Milwaukee Fair Housing Council
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Fair Housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2018 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.

6	<b>Agency/Group/Organization</b>	Employ Milwaukee
	<b>Agency/Group/Organization Type</b>	Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2018 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.
7	<b>Agency/Group/Organization</b>	AIDS RESOURCE CENTER OF WISCONSIN
	<b>Agency/Group/Organization Type</b>	Services-Persons with HIV/AIDS
	<b>What section of the Plan was addressed by Consultation?</b>	HOPWA Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2018 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.
8	<b>Agency/Group/Organization</b>	Community Advocates, Inc.
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2018 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.
9	<b>Agency/Group/Organization</b>	MILWAUKEE CHRISTIAN CENTER
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2018 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.
10	<b>Agency/Group/Organization</b>	Independence First
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The 2019 Annual Action Plan was developed through input from representatives of numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.

**Identify any Agency Types not consulted and provide rationale for not consulting**

Not Applicable. Input was received from numerous entities such as housing, youth, homeless, persons with HIV/AIDS, economic development and jobs, elderly persons, persons with special needs and/or disabilities, City departments, Milwaukee County, residents and others from the private sector.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	City of Milwaukee - CDGA	The City of Milwaukee is the lead agency for the Continuum of Care. All planning and expected outcomes are consistent with CDGA's efforts of achieving the national objective of ending homelessness.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The City's Citizen Participation Plan requires public hearings to obtain citizen input on funding proposals and inquiries at all stages of the community development program, including the Consolidated Plan and Annual Funding Allocation Plan(FAP) and review of proposed activities and program performance. The FAP is meant to define the City's community development needs and funding priorities as it relates to the use of Federal funds. Essentially, the FAP is the basis for the Request for Proposals process. The FAP is reviewed annually through public hearings and amended where appropriate, as needs within the community change. Broad-based citizen and community input by stakeholders is strongly encouraged and solicited. Over the years, the City of Milwaukee has used its Federal entitlement funds to creatively respond to community needs and to enable neighborhood residents, businesses and other community stakeholders to achieve the highest possible quality of life. Community-based organizations are essential to these goals for responding to community needs and for strengthening the social and economic infrastructure of Milwaukee's neighborhoods and their efforts are also coordinated with City agencies which have the same mission.

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish, Hmong, Lao</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	Well attended by diverse group of residents and neighborhood organizations. About 50 people.	Need more affordable, quality housing for all residents; need more resources for housing rehab; address issues with foreclosed properties; respond to youth needs and fund anti-crime initiatives.	Not applicable. All comments were accepted and considered in developing the Year 2019 Annual Action Plan.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish, Hmong, Lao</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	Well attended by diverse group of residents and neighborhood organizations. About 65 people.	Need more affordable, quality housing for all residents; need more resources for housing rehab; address issues with foreclosed properties; respond to youth needs and fund anti-crime initiatives.	Not applicable. All comments were accepted and considered in developing the Year 2019 Annual Action Plan.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public Hearing	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish, Hmong, Lao</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	Well attended by diverse group of residents and neighborhood organizations. About 40 people.	Need more affordable, quality housing for all residents; need more resources for housing rehab; address issues with foreclosed properties; respond to youth needs and fund anti-crime initiatives.	Not applicable. All comments were accepted and considered in developing the Year 2019 Annual Action Plan.	



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Newspaper Ad	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish, Hmong, Lao</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	Not applicable	No comments were received	Not applicable	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	City Website	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish, Hmong, Lao</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	Not applicable	No comments were received	Not applicable	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

Many activities identified in the Consolidated Plan are under the direct control and supported by the following Federal entitlement funds which are administered by the Community Development Grants Administration: **Community Development Block Grant (CDBG), HOME Investment Partnerships, Emergency Solutions Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA)**. Other Federal and State funds will also be used for proposed activities.

CDGA is committed to leveraging funding resources from other types of public and private sources for community development projects funded through CDGA. The projects receiving Emergency Solutions Grant (ESG) funds will utilize CDBG funds and agency private funds and donations to match the use of the ESG funds. Also, in addition to CDBG funds, other State funds and non-governmental funds will be used in conjunction with shelter related activities.

The housing rehabilitation projects will leverage funds from the private sector mostly in the form of funds borrowed from lenders providing construction financing and permanent financing. Low Income Housing Tax Credits directly provide a needed subsidy in low-income rental projects by selling the credits to investors. Matching funding for the HOME program will include Housing Trust Fund projects and other housing activities undertaken by the City of Milwaukee. HOME funds are also sometimes combined with CDBG funds and/or private funds.

Economic development funds will compliment projects from the Department of Justice, Safe Havens which directly impact community security and safety issues.

The priorities and accomplishment goals outlined in this document are based on assumptions about future funding levels for the Consolidated Plan programs. In all cases, the City of Milwaukee has presumed the level of funding of each program based on previous annual funding levels. Because these programs are subject to potential changes due to national funding decisions, the projections and planned activities are subject to change based on the availability of funding. The strategies and recommendations outlined in the document attempt to balance the needs and

priorities of our community and as identified in the data analysis, with the availability of funds.

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	15,793,966	0	1,138,460	16,932,426	0	This includes Affordable Housing; Graffiti Abatement; Code Enforcement; Public Services; Planning; Economic Development; Fair Housing; Technical Assistance; Administration of all funded programs. Prior year resources of 1,138,460 are recovered funds from prior year(s) activities.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	5,379,947	0	1,058,259	6,438,206	0	This includes Affordable Housing: Owner-Occupied & Rental Rehab & New Construction; (Includes CHDO & CHDO Operating Funds. Prior year resources of 1,058,259 are recovered funds from prior year(s) activities.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	868,655	0	0	868,655	0	This Includes: Housing & supportive services for persons with HIV/AIDS to facilitate housing stability, independence and improve quality of life. For persons in 4-County Metro Milwaukee area.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	1,343,635	0	0	1,343,635	0	This includes: Housing and services for homeless individuals and families; victims of domestic violence and troubled youth; including assistance with obtaining appropriate supportive services, permanent housing, transitional housing, medical and mental health treatment, counseling , supervision, and other services essential for independent living.
Other	public - federal	Other	23,630,599	0	0	23,630,599	0	To prevent, prepare for and respond to the Coronavirus.

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

**HOME Funds** – The City of Milwaukee for the past several years has received a HUD waiver. However, when required to match the HOME funds the City will utilize City-owned appraised land/real property, foregone taxes, fees, charges, Housing Trust Fund, City bond financing, eligible City

resources under the Strong Neighborhoods Plan, and other eligible affordable housing projects.

**ESG Funds** – The City meets the HUD requirement by requiring that funded agencies provide documentation of eligible sources of matching funds.



**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

Not applicable

### **Discussion**

The City of Milwaukee continues to seek additional funding sources to support our activities.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing	2015	2019	Affordable Housing	NRSA AREA #1 NRSA AREA #2 City of Milwaukee	Affordable Housing	CDBG: \$4,147,007 HOME: \$5,039,947	Rental units rehabilitated: 5 Household Housing Unit Homeowner Housing Added: 12 Household Housing Unit Homeowner Housing Rehabilitated: 1605 Household Housing Unit
2	Economic Development	2015	2019	Non-Housing Community Development	NRSA AREA #1 NRSA AREA #2 City of Milwaukee	Economic Development	CDBG: \$2,680,500	Jobs created/retained: 65 Jobs
4	Public Services	2015	2019	Non-Housing Community Development	NRSA AREA #1 NRSA AREA #2 City of Milwaukee	Economic Development Neighborhood Strategic Planning Public Services	CDBG: \$3,486,581	Public service activities other than Low/Moderate Income Housing Benefit: 150000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Planning	2015	2019	Planning	City of Milwaukee	Planning	CDBG: \$110,000	Other: 0 Other
7	CDBG Non Profit Organization Capacity Building	2015	2019	Capacity Building for CBOs	City of Milwaukee	CDBG Non Profit Organization Capacity Building	CDBG: \$200,000	Other: 50 Other
9	Administration	2015	2019	Administration	City of Milwaukee	Administration	CDBG: \$1,709,466 HOPWA: \$15,000 HOME: \$340,000	Other: 0 Other
10	Fair Housing	2015	2019	Fair Housing	City of Milwaukee	Fair Housing	CDBG: \$200,000	Other: 150 Other
11	Accessible Rehab	2015	2019	Non-Homeless Special Needs	City of Milwaukee	Accessible Rehab	CDBG: \$42,750	Homeowner Housing Rehabilitated: 60 Household Housing Unit
12	Code Enforcement	2015	2019	Code Enforcement	City of Milwaukee	Code Enforcement	CDBG: \$1,984,162	Housing Code Enforcement/Foreclosed Property Care: 5175 Household Housing Unit
13	Shelter/Domestic Abuse	2015	2019	Homeless	City of Milwaukee	Shelter/Domestic Abuse	CDBG: \$1,300,000	Homeless Person Overnight Shelter: 3675 Persons Assisted
15	HOPWA	2015	2019	HOPWA	4-County Metro Milwaukee area	HOPWA	HOPWA: \$853,655	HIV/AIDS Housing Operations: 108 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
16	Homeless Services-Emergency Solutions Grants	2015	2019	Homeless	City of Milwaukee	Homeless Services-Emergency Solutions Grants	ESG: \$1,343,635	Tenant-based rental assistance / Rapid Rehousing: 2000 Households Assisted Homeless Person Overnight Shelter: 6120 Persons Assisted Homelessness Prevention: 880 Persons Assisted

Table 6 – Goals Summary

## Goal Descriptions

1	Goal Name	Affordable Housing
	Goal Description	<p><b>*Rehabilitate</b> distressed properties in the Target Area with a focus on deteriorated, boarded and vacant properties with an emphasis on foreclosures.</p> <p>At completion, the properties are code compliant and energy efficient and are marketed to income eligible residents.</p> <p><b>*Construct</b> new homes on vacant city lots (infill) for sale to low/moderate income owner-occupants.</p> <p><b>*Provide loans</b> and technical assistance to owner-occupants of one to four unit residential properties in need of repair and at very low interest . Code violations and energy conservation items are the top priorities of the program.</p>

2	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	<p><b><u>Special Economic Development/Business Assistance</u></b> – Community-based agencies provide technical assistance to businesses to help spur new job creation and job retention. Assistance includes: business plan development, financial accounting, loan underwriting, legal and tax consulting and contract procurement.</p> <p><b><u>Revolving Loan Fund Program</u></b> - Expand economic opportunities by provide loans to businesses to create jobs for low income residents.</p> <p><b><u>Office of Small Business Development</u></b> - Assist and protect the interest of emerging and small business concerns. Promote and encourage full and open competition in the City of Milwaukee so emerging businesses may successfully compete in a free market as independent business owners. Establish mentor-protégé relationships between small businesses and those businesses in the mainstream marketplace.</p>
4	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	<p><b><u>Youth Services</u></b> – Social, educational and recreational activities and services for low-moderate income youth safe havens, school-community initiatives, truancy abatement and teen pregnancy prevention.</p> <p><b><u>Community Organizing/Crime Prevention Initiatives</u></b> - Programs are a coordinated, pro-active approach to neighborhood stability combining organizing efforts with public enforcement efforts (DNS, Health , Police and City Attorney) as a tool in dealing with crime, neighborhood clean ups, nuisance properties, block club formation and other neighborhood issues.</p> <p><b><u>Job Placement and Job Training and Placement</u></b> - Skilled trades, industry specific job training and placement opportunities boosting employment and living wage jobs for low-moderate income individuals.</p>
5	<b>Goal Name</b>	Planning
	<b>Goal Description</b>	As Lead agency for the Milwaukee Continuum of Care, this activity includes administration, oversight and management of CoC planning, service coordination and funding processes. This also includes work with the City's Equal Rights Commission.

7	<b>Goal Name</b>	CDBG Non Profit Organization Capacity Building
	<b>Goal Description</b>	Provide technical assistance to community-based organizations to help strengthen their administrative capabilities, board development and promote efficient services to the residents they serve
9	<b>Goal Name</b>	Administration
	<b>Goal Description</b>	This includes administration, management, monitoring and oversight of all Federally-funded programs administered by the Community Development Grants Administration.
10	<b>Goal Name</b>	Fair Housing
	<b>Goal Description</b>	<p><b><u>Fair Housing: Public Education</u></b> - Public education program that includes presentations on fair housing laws, programs for homeowners on discriminatory homeowner's insurance practices, fair housing training seminars, technical assistance on fair housing compliance and housing information referral service to ameliorate racially segregated housing patterns in the metropolitan Milwaukee area.</p> <p><b><u>Fair Housing Enforcement</u></b> - Through walk-ins, general referrals from governmental agencies and other advocacy groups, program provides counseling and testing services for persons alleging violations of fair housing in rental, sale, insurance, financing and appraisals to ameliorate racially segregated housing patterns in metropolitan Milwaukee.</p> <p><b><u>Fair Lending</u></b> - Advocates for the removal of institutional barriers to private sector investments in Milwaukee neighborhoods. Monitors compliance with lending laws and promotes partnership development activity with financial institutions to reduce the patterns of segregation and to increase minority lending practices in metro Milwaukee.</p>
11	<b>Goal Name</b>	Accessible Rehab
	<b>Goal Description</b>	These activities include: Housing accessibility improvements for income eligible persons with physical, visual and hearing disabilities. Improvements can include handicap accessible ramps, bathroom, kitchen, bedroom and living room modifications, safety enhancements and assistive devices.

12	<b>Goal Name</b>	Code Enforcement
	<b>Goal Description</b>	<p>These activities include efforts undertaken primarily in deteriorated areas under the stress of absentee ownership or areas being renewed to address and arrest the decline in a designated blighted area.</p> <p>The following following code enforcement issues will be addressed: Building Code Enforcement, Neighborhood Clean-Ups, Neighborhood Improvement Program, Landlord/Tenant Compliance.</p>
13	<b>Goal Name</b>	Shelter/Domestic Abuse
	<b>Goal Description</b>	<p>These activities include housing and services for homeless individuals and families, victims of domestic violence and troubled youth, including assistance with obtaining appropriate supportive services, permanent housing, transitional housing, medical and mental health treatment, counseling, supervision, street outreach, and other services essential for achieving independent living.</p>
15	<b>Goal Name</b>	HOPWA
	<b>Goal Description</b>	<p>These activities include housing &amp; supportive services for persons with HIV/AIDS to facilitate housing stability, independence and improve quality of life for eligible persons in the 4-County Metropolitan Milwaukee area.</p>
16	<b>Goal Name</b>	Homeless Services-Emergency Solutions Grants
	<b>Goal Description</b>	<p>This project will provide emergency, transitional and permanent housing; supportive services; case management; homeless prevention; tenant-based rental assistance; housing relocation &amp; services; rapid re-housing; street outreach; housing &amp; services for homeless youth and victims of domestic violence.</p>

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

CDGA proposes to target funding to areas with the greatest need, namely the Neighborhood Revitalization Strategy Areas (NRSAs), which based on *Year 2010* Census data, has the highest number of low income persons in the City of Milwaukee. In each of the NRSAs, at least 70% of the total population falls within the HUD-defined low/moderate income category. Funding is also allocated for low income persons in non-NRSA census tracts within the City of Milwaukee.

#### Projects

#	Project Name
1	NRSA Area 1
2	NRSA Area 2
3	Citywide
4	Administration
5	Fair Housing
6	Accessible Rehab
7	Code Enforcement
8	Shelter/Domestic Abuse
9	Vacant/Blighted Real Estate
10	2019 AIDS Resource Center of Wisconsin WIH19F001 (ARCW)
11	2019 Richards Place WIH19F001
12	2019 City of Milwaukee WIH19F001
13	ESG19 Milwaukee
14	CV-ADMIN
15	CV-Emergency Loan Fund
16	CV-Community Resource Navigators
17	CV-Public Health
18	CV-Isolation Facilities
19	CV-Covid-19 2020-2023 AIDS Resource Center of Wisconsin WIH20FHW001 (ARCW)
20	ESG20 Milwaukee
21	CV3-Vaccination Sites
22	CV3-Emergency Response
23	CV3-Homelessness Single Room Occupancy-Permanent Housing



**Table 7 - Project Information**

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Housing: There is a great need for affordable units for those experiencing severe cost burden where more than 30% and 50% of their income is for housing costs. Other problems include: foreclosed and abandoned properties, decreasing owner occupancy, decline in housing values, dislocation of tenants due to foreclosures, quality of housing stock, lack of resources for housing maintenance and repairs. In addition, there is sometimes community opposition to affordable housing developments.

Public Services: As identified through the community input process, there is a need for the following public services in the City of Milwaukee: Employment services, youth programs, services for homeless persons and those with mental, physical and/or developmental disabilities, elderly persons, crime prevention/neighborhood safety, neighborhood improvement initiatives, community organizing, access to affordable health care.

Economic Development: These needs include expansion of opportunity in the areas of employment, education, economic development, job creation, poverty reduction programs, technical and financial assistance to businesses for job creation.

**AP-38 Project Summary**  
**Project Summary Information**

1	<b>Project Name</b>	NRSA Area 1
	<b>Target Area</b>	NRSA AREA #1
	<b>Goals Supported</b>	Affordable Housing Economic Development Public Services
	<b>Needs Addressed</b>	Affordable Housing Economic Development Neighborhood Strategic Planning Public Services
	<b>Funding</b>	CDBG: \$4,798,791 HOME: \$2,008,825
	<b>Description</b>	THIS PROJECT IS A NEIGHBORHOOD REVITALIZATION STRATEGY AREA AND WILL BE INVOLVED IN THE FOLLOWING STRATEGIC ISSUES: HOUSING, ECONOMIC DEVELOPMENT, PLANNING, NEIGHBORHOOD STRATEGIC PLANNING, HEALTH SERVICES, SENIOR SERVICES, YOUTH SERVICES AND PUBLIC SERVICE GENERAL.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
2	<b>Project Name</b>	NRSA Area 2
	<b>Target Area</b>	NRSA AREA #2
	<b>Goals Supported</b>	Affordable Housing Economic Development Public Services
	<b>Needs Addressed</b>	Affordable Housing Economic Development Neighborhood Strategic Planning Public Services
	<b>Funding</b>	CDBG: \$997,290 HOME: \$1,407,500

	<b>Description</b>	THIS PROJECT IS A NEIGHBORHOOD REVITALIZATION STRATEGY AREA AND WILL BE INVOLVED IN THE FOLLOWING STRATEGIC ISSUES: HOUSING, ECONOMIC DEVELOPMENT, PLANNING, NEIGHBORHOOD STRATEGIC PLANNING, HEALTH SERVICES, SENIOR SERVICES, YOUTH SERVICES AND PUBLIC SERVICE GENERAL.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>3</b>	<b>Project Name</b>	Citywide
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Affordable Housing Economic Development Public Services Planning CDBG Non Profit Organization Capacity Building
	<b>Needs Addressed</b>	Affordable Housing Economic Development Neighborhood Strategic Planning Public Services Planning CDBG Non Profit Organization Capacity Building
	<b>Funding</b>	CDBG: \$5,899,967 HOME: \$2,681,881
	<b>Description</b>	THIS PROJECT WILL ADDRESS THE FOLLOWING CITY-WIDE STRATEGIC ISSUES: ECONOMIC DEVELOPMENT, HOUSING, PLANNING, HEALTH SERVICES, PUBLIC SERVICES, CLEARANCE & DEMOLITION AND CDBG NON-PROFIT ORGANIZATION CAPACITY BUILDING.
	<b>Target Date</b>	

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>4</b>	<b>Project Name</b>	Administration
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Administration
	<b>Needs Addressed</b>	Administration
	<b>Funding</b>	CDBG: \$1,709,466 HOME: \$340,000
	<b>Description</b>	ADMINISTRATION FOR ALL ENTITLEMENT PROGRAMS.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>5</b>	<b>Project Name</b>	Fair Housing
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Fair Housing
	<b>Needs Addressed</b>	Fair Housing
	<b>Funding</b>	CDBG: \$200,000
	<b>Description</b>	AMELIORATE RACIALLY SEGREGATED HOUSING PATTERNS IN METROPOLITAN MILWAUKEE.
	<b>Target Date</b>	

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Fair Housing Enforcement - Through walk-ins, general referrals from governmental agencies and other advocacy groups, program provides counseling and testing services for persons alleging violations of fair housing in rental, sale, insurance, financing and appraisals. Fair Lending- Advocates for the removal of institutional barriers to private sector investments in Milwaukee neighborhoods. Monitors compliance with lending laws and promotes partnership development activity with financial institutions to reduce the patterns of segregation and to increase minority lending practices in metro Milwaukee. Conduct Fair Housing public education; Fair Housing enforcement and Fair Lending practices. Address issues of predatory lending.
<b>6</b>	<b>Project Name</b>	Accessible Rehab
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Accessible Rehab
	<b>Needs Addressed</b>	Accessible Rehab
	<b>Funding</b>	CDBG: \$42,750
	<b>Description</b>	THIS PROJECT WILL ADDRESS THE NEED FOR HOUSING ALTERATIONS THAT IMPROVE ACCESSIBILITY FOR PERSONS WITH DISABILITIES.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>7</b>	<b>Project Name</b>	Code Enforcement
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Code Enforcement

	<b>Needs Addressed</b>	Code Enforcement
	<b>Funding</b>	CDBG: \$1,984,162
	<b>Description</b>	THIS PROJECT WILL ADDRESS THE FOLLOWING CODE ENFORCEMENT ISSUES: BUILDING CODE ENFORCEMENT, RENTAL HOUSING PRACTICES AND NEIGHBORHOOD CLEAN UP.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>8</b>	<b>Project Name</b>	Shelter/Domestic Abuse
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Shelter/Domestic Abuse
	<b>Needs Addressed</b>	Shelter/Domestic Abuse
	<b>Funding</b>	CDBG: \$1,300,000
	<b>Description</b>	THIS PROJECT WILL ADDRESS THE FOLLOWING STRATEGIC ISSUES. PERMANENT HOUSING AND SELF SUFFICIENCY, HOMELESS PREVENTION, RUNAWAY/HOMELESS YOUTH ABUSED AND/OR NEGLECTED CHILDREN AND DOMESTIC VIOLENCE INTERVENTION AND PREVENTION.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>9</b>	<b>Project Name</b>	Vacant/Blighted Real Estate
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Code Enforcement

	<b>Needs Addressed</b>	Vacant/Blighted Real Estate
	<b>Funding</b>	:
	<b>Description</b>	THIS PROJECT WILL ACQUIRE BLIGHTED PROPERTIES FOR REDEVELOPMENT, ENSURE MAINTENANCE AND PROPER PHYSICAL CONDITION OF CITY OWNED VACANT LOTS AND MAINTAIN PROPERTIES ACQUIRED BY THE CITY THROUGH FORECLOSURE AND OTHER AREAS.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
10	<b>Project Name</b>	2019 AIDS Resource Center of Wisconsin WIH19F001 (ARCW)
	<b>Target Area</b>	4-County Metro Milwaukee area
	<b>Goals Supported</b>	HOPWA
	<b>Needs Addressed</b>	HOPWA
	<b>Funding</b>	HOPWA: \$640,335
	<b>Description</b>	THIS PROJECT WILL CREATE A COOPERATIVE PLANNING INITIATIVE AMONG SERVICE PROVIDERS WORKING WITH THE HIV/AIDS POPULATION, TO DETERMINE CURRENT NEEDS AND AREAS OF SERVICE GAPS AND FUNDING GAPS IN ORDER TO PROVIDE COORDINATED CASE MANAGEMENT SERVICES & ASSISTANCE IN OBTAINING AND PROVIDING LOW COST HOUSING.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
	<b>Project Name</b>	2019 Richards Place WIH19F001



11	<b>Target Area</b>	4-County Metro Milwaukee area
	<b>Goals Supported</b>	HOPWA
	<b>Needs Addressed</b>	HOPWA
	<b>Funding</b>	HOPWA: \$213,320
	<b>Description</b>	THIS PROJECT WILL CREATE A COOPERATIVE PLANNING INITIATIVE AMONG SERVICE PROVIDERS WORKING WITH THE HIV/AIDS POPULATION, TO DETERMINE CURRENT NEEDS AND AREAS OF SERVICE GAPS AND FUNDING GAPS IN ORDER TO PROVIDE COORDINATED CASE MANAGEMENT SERVICES & ASSISTANCE IN OBTAINING AND PROVIDING LOW COST HOUSING.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
12	<b>Project Name</b>	2019 City of Milwaukee WIH19F001
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	HOPWA
	<b>Needs Addressed</b>	HOPWA
	<b>Funding</b>	HOPWA: \$15,000
	<b>Description</b>	ADMINISTRATION FOR THE HOPWA PROGRAM.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
	<b>Project Name</b>	ESG19 Milwaukee

13	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Homeless Services-Emergency Solutions Grants
	<b>Needs Addressed</b>	Homeless Services-Emergency Solutions Grants
	<b>Funding</b>	ESG: \$1,343,635
	<b>Description</b>	This project will provide emergency, transitional and permanent housing; supportive services; case management; homeless prevention; tenant-based rental assistance; housing relocation & services; rapid re-housing; housing & services for homeless youth and victims of domestic violence.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
14	<b>Project Name</b>	CV-ADMIN
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Administration
	<b>Needs Addressed</b>	Administration
	<b>Funding</b>	CDBG-CV: \$50,000
	<b>Description</b>	Funds used to prevent, prepare for, and respond to the Coronavirus.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	City of Milwaukee
15	<b>Planned Activities</b>	Administration of CARES Act Activities
	<b>Project Name</b>	CV-Emergency Loan Fund
	<b>Target Area</b>	City of Milwaukee

	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG-CV: \$2,000,000
	<b>Description</b>	To prevent, prepare for, and respond to the Coronavirus. This activity will provide loans to businesses primarily for supplies and equipment that assist with transitioning business models, accommodate social distancing, and personal protective equipment.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Up to 100 families will be impacted by this activity.
	<b>Location Description</b>	City of Milwaukee
	<b>Planned Activities</b>	Grant and Forgivable loans to business adversely affected by the Coronavirus Pandemic.
16	<b>Project Name</b>	CV-Community Resource Navigators
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG-CV: \$2,805,000
	<b>Description</b>	To Prevent, Prepare for and Respond to the Coronavirus. This Activity serves as a link between underserved communities and existing community resources. Activity will provide humanitarian assistance through work activities designed to save lives, alleviate suffering, and maintain human dignity, including the provision of food, clothing and shelter.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Up to 200 families will be impacted by this activity.
	<b>Location Description</b>	City of Milwaukee

	<b>Planned Activities</b>	<p>Delivers medicine, food, supplies to older or at risk individuals</p> <p>Assists with quarantined individuals and/or helping to set up quarantine areas</p> <p>Assists with COVID-19 contact tracing activities.</p> <p>Other activities as needed</p>
17	<b>Project Name</b>	CV-Public Health
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG-CV: \$4,000,000
	<b>Description</b>	To Prevent, Prepare for and Respond to the Coronavirus. Additional staff located in the Milwaukee Health Department to help with the high demand for contact tracing, testing, and vaccine dispersal.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that up to 100 families will be affected by this activity.
	<b>Location Description</b>	City of Milwaukee
	<b>Planned Activities</b>	Contact Tracing, Coronavirus testing, and vaccine dispersal
18	<b>Project Name</b>	CV-Isolation Facilities
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Shelter/Domestic Abuse
	<b>Needs Addressed</b>	Shelter/Domestic Abuse
	<b>Funding</b>	CDBG-CV: \$719,616
	<b>Description</b>	To Prevent, Prepare for and Respond to the Coronavirus. Temporary shelter for high risk population of homeless individuals.
	<b>Target Date</b>	12/31/2021

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Up to 200 persons will benefit from this activity
	<b>Location Description</b>	City of Milwaukee
	<b>Planned Activities</b>	Providing shelter primarily with hotel vouchers.
19	<b>Project Name</b>	CV-Covid-19 2020-2023 AIDS Resource Center of Wisconsin WIH20FHW001 (ARCW)
	<b>Target Area</b>	4-County Metro Milwaukee area
	<b>Goals Supported</b>	HOPWA
	<b>Needs Addressed</b>	HOPWA
	<b>Funding</b>	HOPWA-CV: \$142,391
	<b>Description</b>	To prevent, prepare for and respond to the Coronavirus. THIS PROJECT WILL CREATE A COOPERATIVE PLANNING INITIATIVE AMONG SERVICE PROVIDERS WORKING WITH THE HIV/AIDS POPULATION, TO DETERMINE CURRENT NEEDS AND AREAS OF SERVICE GAPS AND FUNDING GAPS IN ORDER TO PROVIDE COORDINATED CASE MANAGEMENT SERVICES & ASSISTANCE IN OBTAINING AND PROVIDING LOW COST HOUSING.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Up to 50 families will be assisted with these activities.
	<b>Location Description</b>	4 County Metro-Milwaukee Area (Milwaukee, Ozaukee, Washington, and Waukesha)
	<b>Planned Activities</b>	Short-term rent, Mortgage, and Utility Assistance (STRMU) and Supportive Services.
20	<b>Project Name</b>	ESG20 Milwaukee
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Homeless Services-Emergency Solutions Grants
	<b>Needs Addressed</b>	Homeless Services-Emergency Solutions Grants

	<b>Funding</b>	ESG-CV: \$11,936,625
	<b>Description</b>	THIS PROJECT WILL PROVIDE EMERGENCY, TRANSITIONAL AND PERMANENT HOUSING; SUPPORTIVE SERVICES; CASE MANAGEMENT; HOMELESS PREVENTION; TENANT-BASED RENTAL ASSISTANCE; HOUSING RELOCATION & SERVICES; RAPID RE-HOUSING; HOUSING & SERVICES FOR HOMELESS YOUTH AND VICTIMS OF DOMESTIC VIOLENCE. \$76,000 will be used for Administration/Planning at 5.5%; \$755,400 Street Outreach & Shelter at 54.4%CV-ESG (4,785,445)to prevent, prepare for, and respond to the Coronavirus. (1,387,799) for Federal ESG.CV2-ESG (5,763,381)to prevent, prepare for, and respond to the Coronavirus.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Up to 3200 families will benefit from these activities.
	<b>Location Description</b>	City of Milwaukee
	<b>Planned Activities</b>	Homeless overnight shelter, Homeless Prevention, Rapid Rehousing, Case management, and other supportive services.
21	<b>Project Name</b>	CV3-Vaccination Sites
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG-CV3 for CDBG Cares Act Funding: \$310,000
	<b>Description</b>	To prevent, prepare for, and respond to the Coronavirus. Public Vaccination Sites.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2000 low moderate income families.
	<b>Location Description</b>	City of Milwaukee
	<b>Planned Activities</b>	Vaccination sites for low moderate income families.

22	<b>Project Name</b>	CV3-Emergency Response
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG-CV3 for CDBG Cares Act Funding: \$1,754,766
	<b>Description</b>	To prevent, prepare for, and respond to the Coronavirus.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	400 low moderate income families
	<b>Location Description</b>	City of Milwaukee
	<b>Planned Activities</b>	To prevent, prepare for, and respond to the Coronavirus.
23	<b>Project Name</b>	CV3-Homelessness Single Room Occupancy-Permanent Housing
	<b>Target Area</b>	City of Milwaukee
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG-CV3 for CDBG Cares Act Funding: \$1,300,000
	<b>Description</b>	To prevent, prepare for, and respond to the Coronavirus. Mechanical Updates for homelessness facilities.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	40 low moderate individuals.
	<b>Location Description</b>	City of Milwaukee
	<b>Planned Activities</b>	To prevent, prepare for, and respond to the Coronavirus.

## AP-50 Geographic Distribution – 91.220(f)

### Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

CDGA proposes to target funding to areas with the greatest need, namely the Neighborhood Revitalization Strategy Areas (NRSAs), which based on *Year 2010* Census data, has the highest number of low income persons in the City of Milwaukee. In each of the NRSAs, at least 70% of the total population falls within the HUD-defined low/moderate income category. Funding is also allocated for low income persons in non-NRSA census tracts within the City of Milwaukee.

The census tracts for NRSA 1 are as follows:

11,12,13,14,15,19, 20,21,22,23,24,25,26,27,28,37,38,39,40, 41,42,43, 44,45,46,  
47,48,49,50,59,60,61,62,63,64,65,66,67, 68, 69,70,79,80,81,84, 85,86, 87, 88,89, 90,  
91,92,93,96,97,98,99,106, 107,122, 123,133,134,135,136,137,141,  
146,147,148,149,1854,1855,1856,1857,1858,1859,1860,1861,1862, 1864.

The census tracts for NRSA 2 are as follows:

157,158,159,160,161,162,163,164,165,166,167,168,169,170,  
171,173,174,175,176,186,187,188,1865,1866

### Geographic Distribution

Target Area	Percentage of Funds
NRSA AREA #1	34
NRSA AREA #2	13
City of Milwaukee	50
4-County Metro Milwaukee area	3

**Table 8 - Geographic Distribution**

### Rationale for the priorities for allocating investments geographically

CDGA proposes to target funding to areas with the greatest need, namely the Neighborhood Revitalization Strategy Areas (NRSAs), which based on *Year 2010* Census data, has the highest number of low income persons in the City of Milwaukee. In each of the NRSAs, at least 70% of the total population falls within the HUD-defined low/moderate income category. Funding is also allocated for low income persons in non-NRSA census tracts within the City of Milwaukee. The major emphasis is on targeting resources to effectuate neighborhood revitalization by integrating housing, economic development and public services in a tightly defined geographic area through a clear and well planned development



strategy.

## **Discussion**

There continues to be racial and ethnic concentrations both within the City of Milwaukee and in the Milwaukee Metropolitan Statistical Area(MMSA). According to the *U.S. Census, 2010*, there is a pattern of concentration of all minorities within the area generally considered to be the "central city." The concentration still remains greatest for African Americans and has been noted by several local and national research studies. Most marked is the concentration of African Americans within the city limits and the fact that only 1.5% of the suburban population of the four-County Milwaukee Metropolitan Area is Black.

Milwaukee's residential segregation has been studied for decades by local and national researchers and policymakers. The tremendous impact on the gaps between Black and Whites as it relates to income, mortgage loan disparity rates and educational attainment, has been cited in numerous national studies. It is important to note the overlay of economic segregation as this impacts employment and other opportunities for minorities. CDGA-funded programs providing "seed capital" for new economic development activities continues to be a high priority as a means of stimulating economic opportunities including job creation - for Milwaukee residents in the identified Neighborhood Revitalization Strategy Areas (NRSAs).

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The Community Development Grants Grant Administration (CDGA) has defined a Housing and Community Development 5-Year Strategy which focuses on creating viable neighborhoods and providing decent and affordable housing and economic opportunity for all residents. This community vision recognizes that housing is a critical part of a viable neighborhood system, which also includes public safety, education, employment opportunities, business development and access to community social services. The City will continue to encourage CDBG, HOME and other HUD-funded project recipients to include work experience opportunities in their housing rehab and new construction projects and to link their projects with other public and private human service, resident organizing and economic development initiatives. The City will utilize CDBG and HOME entitlement funds to accomplish the specific housing goals along with other leveraged resources. In addition, the City will continue to expand collaborations with lenders, businesses, developers, other governmental entities, community stakeholders and other development resources such as WHEDA and Community Development Financial Institutions (CDFIs) to expand available resources.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	1,605
Special-Needs	0
Total	1,605

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	12
Rehab of Existing Units	1,588
Acquisition of Existing Units	5
Total	1,605

Table 10 - One Year Goals for Affordable Housing by Support Type

#### Discussion

The need to focus on neighborhoods as a whole as well as individual housing units is well supported by the data. Over the past several years, various City departments have worked in collaboration with citizens and community-based agencies on initiatives to strengthen neighborhoods. By involving citizens in code enforcement, graffiti abatement, crime prevention, neighborhood cleanups, lead abatement and housing development, such as the Milwaukee Builds Housing Apprenticeship Program, community

cohesion is improved while the physical appearance and safety of neighborhoods is enhanced.

The lack of adequate safe, decent and affordable housing in Milwaukee is the greatest obstacle in meeting the housing needs of Milwaukee's low income citizens. In addition, the lack of adequate jobs at family supporting wages is a major obstacle in obtaining housing and achieving safe and viable neighborhoods. The lack of jobs creates the cycle of poverty that leads to economic segregation, the flight of the middle class to the suburbs, physical deterioration of neighborhoods and a variety of social ills such as high crime, teen pregnancy and illiteracy. In addition, the lack of adequate funding for housing providers to meet the tremendous demand, coupled with capacity issues, all pose challenges to meeting underserved housing needs.

The City will develop, maintain and expand the supply of affordable, safe and decent housing that is accessible to income eligible persons; expand opportunities for low income citizens to access affordable housing; increase maintenance and improvement of existing units; assist in preserving existing housing units.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The mission of the Housing Authority of the City of Milwaukee is to provide decent, quality, safe and affordable housing with transition options for those who desire them. “Transition option” is defined as the opportunity for residents to self-determine their interest in, and have access to, housing options that support long-term self-sufficiency.

The Housing Authority of the City of Milwaukee manages 3,419 public housing units.

Most of the housing units are in good to excellent condition; however, the configuration of the apartments in the round towers are challenging for the staff and its residents. The Housing Authority is in the process of revitalizing its’ Westlawn public housing development and is continuing to revitalize its Scattered Sites portfolio.

The Housing Authority maintains two separate wait lists for its public housing program: 1) the family wait list, and 2) the elderly/near elderly/disabled wait list.

### **Actions planned during the next year to address the needs to public housing**

The following information in this section is excerpted from the Housing Authority’s Agency Plan that was approved by the Dept. of Housing & Urban Development.

#### **Actions planned during the next year:**

Increase the availability of decent, safe, and affordable housing; maximize the number of affordable units available to the PHA within its current resources; promote self-sufficiency and asset development of families and individuals; conduct activities to affirmatively further fair housing; increase awareness and target PHA resources among families of races and ethnicities with disproportionate needs and to families with disabilities; target available assistance to the elderly and families at or below 30% and 50% of AMI.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

The Housing Authority is governed by seven Commissioners, two of whom are public housing residents. It is their responsibility to determine Housing Authority policy and assure agency compliance with all applicable state laws and federal regulations. The Housing Authority will continue to support the Resident Advisory Board, which is the organization that represents the residents of the entire Housing Authority of the City of Milwaukee (HACM) and includes representatives from HACM’s housing developments and the Rent Assistance Program. The Housing Authority meets with the Resident

Advisory Board (RAB) on a monthly basis. The RAB assists the Housing Authority with the development and implementation of policies and plans, including the Annual Plan. In addition to the Resident Advisory Board, each of the Housing Authority's developments has a Resident Council that meets on a monthly basis to discuss policies and procedures, programs and activities that affect their housing development. Both the RAB and the Resident Councils also receive a small amount of HUD funding every year to help fund resident participation activities.

HACM has also worked to improve resident leadership capacity by providing training and technical assistance to resident leaders.

HACM works closely with the City of Milwaukee to leverage funding and other resources to address public housing needs. Two specific examples of the City's partnership with the Housing Authority is the City's participation in the Choice Neighborhoods Implementation grant and the Neighborhood Stabilization Program. The Department of City Development is the Neighborhood Implementation Entity for the Choice Neighborhoods grant, and If the Housing Authority receives a Choice Neighborhoods grant, the City will provide Community Development Block Grant funds to support eligible activities in the Westlawn Transformation Plan. The Housing Authority was a subgrantee on the Neighborhood Stabilization Program (NSP) grant and is continuing to work with the Department of City Development on the implementation plan to address abandoned and foreclosed properties in the City of Milwaukee.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

Not applicable. The City of Milwaukee Housing Authority is not designated as troubled.

**Discussion**

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

Persons with special needs as well as the homeless are an important concern for the City as it is recognized that addressing the needs of all citizens, regardless of their circumstance, is an essential component to strengthening neighborhoods.

To further the City's strategic goal of reducing and preventing homelessness and domestic violence in our community, the City will continue to allocate CDBG and Emergency Solutions Grant (ESG) funds for activities geared to assist homeless persons achieve stable housing and self-sufficiency. These funds will be provided to conduct outreach and homeless prevention activities, to operate shelter facilities, provide supportive services, legal assistance and other services aimed at preventing and reducing homelessness for individuals, families, runaway/homeless youth, victims of domestic violence and mentally and physically disabled persons.

The jurisdiction will utilize a variety of resources to address homelessness in Milwaukee, including but not limited to: U.S. Dept. of Housing & Urban Development, State of Wisconsin Dept. of Health & Human Services, Emergency Food & Shelter Program (FEMA), State Runaway Grant, State of Wisconsin ESG/THP/HPP; City of Milwaukee ESG, City of Milwaukee CDBG, State Shelter Subsidy Grant; United Way of Greater Milwaukee, numerous foundations and individual donors.

In addition, the City of Milwaukee will continue as the Continuum of Care Lead Agency, including involvement in activities to advance the 10-Year Plan to End Homelessness which is the plan approved by the City of Milwaukee as its jurisdictional plan to end homelessness.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

##### **Outreach and Coordinated Entry**

Outreach and coordinated entry are the foundation for a strong and effective homeless services system. Linking people who are at imminent risk of homelessness with resources to sustain permanent housing in the community is a critical component of an early intervention system. Making sure that people who have no other option than shelter are referred to the most appropriate setting is as important. Milwaukee's street outreach network works in tandem with Coordinated Entry to connect people with services and resources that match their immediate needs while emphasizing permanent housing solutions.

**Street outreach** will continue to be provided to homeless adults and youth. Outreach will engage

homeless people on the street, in parks, under bridges, encampments, and abandoned buildings. Outreach workers will provide food, clothing and personal care items as immediate assistance and connect homeless with HIV testing, substance abuse services, benefits assistance, and access to shelter, transitional housing, safe haven, and permanent supportive housing. This collaborative effort has much improved the use of outreach resources in Milwaukee and has resulted in a significantly increased number of people who are homeless, especially chronically homeless, being able to access needed health, financial and housing resources. The collaborative is also a primary outreach vehicle for Milwaukee County's Housing First Initiative, slated to house 300 chronically homeless individuals by 2019. **Goal: 8,500 homeless encounters annually**

Engagement of homeless children and families in the Homeless Education Program operated by the Milwaukee Public Schools (primary LEA in Milwaukee County) is a major priority for the Continuum of Care and an area of great collaboration and success over the past ten years. A representative of the LEA sits on the CoC Executive Board and is an active part of the Shelter and Transitional Housing Task Force (an arm of the CoC) and numerous special focus work groups. Homeless children are immediately connected to HEP when they enter a CoC program. HEP then quickly arranges school transportation to ensure no disruption in school attendance and enrolls the family in HEP. This means that children can receive all HEP services including free breakfast/lunch, before/after school programs, tutoring, fee waivers, free books/materials, ESL, school health, special education and all other HEP authorized services. HEP staff regularly provides training for emergency shelter, transitional housing and permanent housing staff and conducts regular on-site visits to answer questions and maintain good communication. **Goal: 3,700 homeless students served annually**

**Coordinated Entry (CE)** is fully implemented for families and single women and men seeking emergency shelter. Coordinated Entry functions as a one-call system operated by 211 at IMPACT, accessible via phone call, text message and online. Each caller's situation is assessed using the Vulnerability Index (VI) which examines current living situation, health, mental health, income, veteran status, presence of domestic violence and other factors. When completed, the VI generates a 'score' that is used to prioritize callers for placement in emergency shelter. In 2015, a total of 2,787 adults and children were served by the Continuum of Care emergency shelters; other callers to Coordinated Entry with less urgent levels of need were referred to 211's extensive network of supportive services. **Goal: 24,000 CE callers served annually**

## **Addressing the emergency shelter and transitional housing needs of homeless persons**

### **Emergency and Transitional Housing**

Emergency shelter and transitional housing are resources for individuals and families in greatest need who have no other housing option in the community. Homelessness prevention and rapid re-housing are strategies intended to reduce the reliance on emergency shelter and transitional housing and increase the rate of successful placement in permanent unsubsidized or supportive housing in the

community.

**Emergency shelter** capacity is currently 303 beds for families, 434 beds for single adults, and 28 beds for unaccompanied youth. No additional emergency shelter capacity is required or planned.

**Goal: 1,200 people served as members of households; 1,200 people served as single adults annually with the number decreasing over the next five years**

**Transitional housing** (and Safe Haven) capacity is currently 6 beds for families, 151 beds for single adults, 75 beds earmarked specifically for veterans, and 15 beds for unaccompanied youth. Continued efforts to seek reallocation of CoC-funded transitional housing projects to permanent supportive housing for chronically homeless individuals and/or families and/or rapid-re-housing for families is planned for 2019 to support the Continuum of Care's increasing emphasis on Housing First.

Special populations will continue to receive emergency shelter and transitional housing services tailored to their unique needs. Included in this category are veterans, veterans' families, victims of domestic violence, people with HIV/AIDS, and unaccompanied youth.

**Goal: 450 persons served as members of households; 600 people served as single adults annually with the number decreasing every year over the next five years.**

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

#### **Transition to Permanent Housing**

**Reducing the Length of Time Homeless** is a major priority for the WI-501 Milwaukee City & County Continuum of Care (CoC). In 2018, the average length of time homeless (LOTH) for Emergency Shelter and Safe Haven was 50 days, a slight increase from 2017 when the LOTH was 47 days. The CoC's plan to reduce the LOTH includes expanded Rapid Re-housing capacity, full implementation of the Housing First Initiative and the implementation of Permanent Housing through Coordinated Entry.

**Rapid Re-housing** is a growing resource for homeless families and youth in Milwaukee CoC. Currently, the CoC has 313 Rapid Re-housing beds for families. These programs are crucial to our system to help



individuals, youth and families quickly exit homelessness and return to a more permanent situation.

**Goal: 354 served in families with children with the number increasing every year over the next five years; Reduction in Length of Stay**

**Permanent Supportive Housing** capacity is currently 332 beds for people in families with children, 1,551 beds for single adults, 535 beds for people who are chronically homeless, and 604 beds for veterans. The CoC has very aggressively pursued opportunities to increase PSH capacity, especially for people who are chronically homeless. Between 2013 and 2015, the CoC reallocated an SSO project to create 13 new PSH beds for chronically homeless; converted 25 Shelter + Care beds operated by Milwaukee County to dedicated CH use; implemented the policy that 100% of PSH beds available via turnover are prioritized for chronically homeless; and began implementation of the City/County Housing First Initiative. In addition, Friends of Housing has reallocated its Transitional Housing Program to PSH for CH families and singles; and the CoC has established policies reinforcing Housing First and Low Barrier across its system. In addition, this year's HUD application included a Milwaukee County request for a 160-bed PSH/CH bonus project

**The plan to increase Permanent Supportive Housing includes:**

- Reallocation of additional Transitional Housing beds to PSH
- Acquisition of additional TBRA (Tenant-Based Rent Assistance) to support Housing First efforts
- Development of a Housing First endowment to fund supportive services/case management for people in PSH
- Careful monitoring of PSH residents to determine eligibility for other non-CoC rent subsidy programs
- Partnership with private housing developers to increase PSH capacity in Milwaukee

**Goal: Increase the number of PSH beds dedicated for use by the chronically homeless with ongoing increases to address need as quantified by Point in Time and HMIS data**

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

**Homelessness prevention** is an area of increasing emphasis for the CoC, particularly in light of the significant percentage of people who contact Coordinated Entry whose situations qualify them as

Category 2 (49.4%); these are individuals and people in families experiencing housing instability but they are temporarily staying with family or friends. Many are first-time homeless. In 2014, 66.1% of people entering the CoC system (Emergency Shelter, Safe Haven, Transitional Housing and Permanent Housing) were homeless for the first time. The CoC's plan is to reduce the number of first time homeless by making referrals to Community Advocates Homeless Prevention Programs for eviction prevention, utility aid and rent assistance and to Cathedral Center for Community Case Management. Both programs emphasize keeping individuals and families housed in the community without the disruption caused by shelter stays.

In addition to these two specific programs, system-wide efforts focused on preventing homelessness including:

1. Insuring that Coordinated Entry is widely publicized and utilized by residents of the entire county so that people at risk of homelessness can gain access to prevention services relating to basic needs, income, employment, transportation, and other assistance;
1. Providing ESG-funded prevention services including housing relocation, stabilization and tenant-based rental assistance;
1. Increasing utilization of cash and non-cash mainstream resources;
1. Supporting efforts to provide special intervention to achieve permanent housing placement for people leaving foster care, hospitals, mental health facilities, and corrections;

**Preventing discharges to homelessness** by institutions will be addressed by the CoC by 1) maintaining good communication with institutions' discharge planning entities including health care facilities, mental health facilities, foster care and corrections; 2) providing case by case assistance to help discharged individuals avoid homelessness and obtain secure housing with an emphasis on acquiring permanent supportive housing; 3) activating community resources such as CCS (Comprehensive Community Services) to provide case management to vulnerable populations; and 4) fully implementing Housing First to break the cycle of institutional stays and help vulnerable homeless to acquire and maintain safe housing. In 2015, 10.4% (207) of people coming into Emergency Shelter had been discharged from institutional settings. Of the 207, the discharges occurred as follows: psychiatric hospital 22.2%, substance abuse treatment facility 12.6%, hospital 21.3%, corrections 39.1% and foster care 4.8%.

**Goal: Decrease in the number of individuals and families with children who become homeless as evidenced by entry into emergency shelter**

## **Discussion**

**Reduction in the Rate of Return** will continue to be tracked using an HMIS-generated Rate of Return (RoR) report to identify homelessness or return to shelter after exiting any CoC-funded housing

program. The CoC will also continue to use RoR as a criterion in the annual HUD renewal project ranking.

**The plan to reduce the Rate of Return includes:**

- Increasing income through utilization of cash and non-cash mainstream resources including SSI/SSDI;
- Increasing employment through collaboration with employment service providers;
- Achieving maximum enrollment in Affordable Care Act health insurance; and
- Improving access and utilization of mental health and substance abuse services

**Goal: Reduction in rate of return to national best practice level**

**AP-70 HOPWA Goals– 91.220 (I)(3)**

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	100
Tenant-based rental assistance	0
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	4
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	4
Total	108

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

The City of Milwaukee: *Analysis of Impediments to Fair Housing* study identifies numerous impediments some of which present barriers to affordable housing, fair housing and housing choice. The following is a summary of those impediments.

### **Summary of Impediments:**

- Institutional and governmental policies and regulations which affect income and housing
- Non-coherent Federal housing mandates and Federal and State transportation policies
- Lack of enforcement mechanism for complaints of discrimination
- Lack of housing units accessible to persons with disabilities
- Overcrowded housing
- Lack of affordable housing supply
- Cuts in funding to Section 8 Housing Choice Voucher Program
- Lack of a Regional Housing Strategy or Plan
- Attack on the Community Reinvestment Act (CRA)
- Suburban policies (NIMBYism, impact fees, exclusionary zoning codes, exclusionary public housing or Section 8 Rent Assistance vouchers, inadequate public transportation).
- Social class, racial and cultural barriers
- Housing and employment discrimination
- Residential segregation
- Inadequate income
- Racial disparities in mortgage lending
- Insurance redlining; appraisal practices
- 
- Racial steering

**Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The City of Milwaukee will continue to fund multiple housing and other programs designed to affirmatively market Milwaukee neighborhoods and reduce barriers to affordable housing. These programs support the administration and enforcement of federal, state and local fair housing ordinances, provide homebuyer counseling services and collaboratively work with financial lenders to enable low and moderate-income families to purchase homes anywhere they choose. Viewed

holistically, these programs accomplish several purposes at once: they affirmatively promote neighborhoods; enforce and further fair housing; expand on housing opportunities available to minorities and the poor within and outside of areas of minority concentration and help to strengthen neighborhoods by increasing homeownership and eliminating blight.

The City has recently enacted an ordinance which allows the City to use their TIF authority to subsidize affordable housing. The ordinance allows the City to extend one additional year the increments of an expiring TIF development in a defined area for one additional year, and dedicate it to other affordable housing projects. The City of Milwaukee is the State's first municipality to enact this ordinance using the State's enabling legislation.

The City also continues to provide funding and staff to the City of Milwaukee Housing Trust Fund. The Housing Trust Fund has been able to address some of the city's housing needs through gap financing and other means for the last several years. Increasing homeownership, increasing the supply of quality rental housing opportunities and providing housing opportunities for the homeless are three of the trust fund's goals.

The City's Strong Neighborhoods Initiative is assisting the City and local nonprofits in more effectively addressing the housing foreclosure crisis and its impacts on our neighborhoods. Neighborhoods of color are disproportionately harmed by the foreclosure crisis.

#### **City Subcontracts with Fair Housing Programs**

The City will subcontract with the Metropolitan Milwaukee Fair Housing Council (MMFHC) and the Legal Aid Society of Milwaukee to respond to the problem of predatory lending and affirmatively work toward integrated housing patterns.

**Metropolitan Milwaukee Fair Housing Council (MMFHC)** will affirmatively work toward integrated housing patterns by providing: fair housing/ fair lending presentations, research and technical assistance on fair housing/ fair lending issues, information on buying, renting and selling homes, counseling and investigation services to receive and resolve fair housing/fair lending complaints and distribution of a quarterly fair housing newsletter and a coordinated community-wide response to the problem of predatory lending.

The **Legal Aid Society of Milwaukee**, Inc., will continue to operate its' A-LINE Project and represent vulnerable inner city residents who have been victims of predatory lending practices. Legal Aid Society will continue to provide direct representation to victims of predatory mortgage lending practices and mortgage foreclosure rescue scams. Legal Aid will continue its efforts to challenge the unconscionable

practices of auto title lenders in our community.

**Discussion:**

The Analysis of Impediments to fair housing is a document that is required every 5 years from any Participating Jurisdiction that conforms to the Block Grant Consolidated Planning process and Public Housing Agencies (PHAs). The U.S. Department of Housing and Urban Development in the Final Rule for the Affirmatively Fair Housing Marketing Plan (AFHMP) stated best practices for submission of the plan. A regional planning process approach will assist communities analyze challenges to fair housing choice and establish goals and priorities to address the fair housing barriers.

Jurisdictions and Public Housing Authorities supporting the 2018 Milwaukee County AFHMP:

- City of Milwaukee
- Housing Authority City of Milwaukee
- Milwaukee County Housing Division
- Milwaukee County Housing Division (PHA)
- City of Wauwatosa
- City of West Allis
- West Allis Public Housing Authority

## AP-85 Other Actions – 91.220(k)

### Introduction:

The City of Milwaukee has implemented two major initiatives, the Strong Neighborhoods and Growing Prosperity Plans, to address issues of affordable housing, foreclosure, economic opportunities, quality of life, and neighborhood stability.

In 2014, Mayor Barrett and the Common Council established the Strong Neighborhoods Plan as the City's "all hands on deck" approach to vacancy and foreclosure. The Plan seeks to build on Milwaukee's success in stabilizing the housing market, and continue the city's recovery from the foreclosure crisis. Since 2014, the Mayor and Council have allocated over \$44 million for Strong Neighborhoods.

The plan has four strategic goals:

- PREVENT tax delinquency and tax foreclosure
- MITIGATE blight and ensure vacant properties do not deteriorate
- REVITALIZE neighborhoods through sales and rehab of tax foreclosed property
- RENEW Milwaukee neighborhoods by activating vacant space

Growing Prosperity is an Action Agenda for Economic Development in the City of Milwaukee addressing the need for actions to be taken in the city itself—by city government and by others— to capitalize on regional strategies for growth so that the city can thrive in an increasingly global economy.

Growing Prosperity outlines 10 principles and a broad vision, closely aligned with the goals of the M7 framework that will put the City of Milwaukee and its residents on a path to economic success.

This Action Agenda explores four areas of focus:

- location-based opportunities,
- human capital development,
- entrepreneurship and innovation, and
- quality of life and place

Both plans require partnerships with some of the many businesses, foundations, nonprofits, and other organizations that work in the City of Milwaukee.

### Actions planned to address obstacles to meeting underserved needs

The Community Development Grants Grant Administration (CDGA) has defined a Housing and Community Development 5-Year Strategy which focuses on creating viable neighborhoods and providing decent and affordable housing and economic opportunity for all residents. This community vision



recognizes that housing is a critical part of a viable neighborhood system, which also includes public safety, education, employment opportunities, business development and access to community social services. The City will continue to encourage CDBG, HOME and other HUD-funded project recipients to include work experience opportunities in their housing rehab and new construction projects and to link their projects with other public and private human service, resident organizing and economic development initiatives. The City will utilize CDBG and HOME entitlement funds to accomplish the specific housing goals along with other leveraged resources. In addition, the City will continue to expand collaborations with lenders, businesses, developers, other governmental entities, community stakeholders and other development resources such as WHEDA and Community Development Financial Institutions (CDFIs) to expand available resources. The need to focus on neighborhoods as a whole as well as individual housing units is well supported by the data. Over the past several years, various City departments have worked in collaboration with citizens and community-based agencies on initiatives to strengthen neighborhoods. By involving citizens in code enforcement, graffiti abatement, crime prevention, neighborhood cleanups, lead abatement and housing development, such as the Fresh Start housing program, community cohesion is improved while the physical appearance and safety of neighborhoods is enhanced.

### **Actions planned to foster and maintain affordable housing**

Develop, maintain and expand the supply of affordable, safe and decent housing that is accessible to income eligible persons; expand opportunities for low income citizens to access affordable housing; increase maintenance and improvement of existing units; assist in preserving existing housing units.

The City continued to promote and provide opportunities for low income citizens to access affordable housing. All of the programs listed hereafter in this section provide outcomes that are consistent with the goals articulated in the Consolidated Plan. The Plan indicated that efforts will be made to increase homeownership opportunities and to improve the condition of the City's rental housing stock with an emphasis on large family rental units

### **Actions planned to reduce lead-based paint hazards**

The Health Department will continue to work closely with other City Departments and community partners on efforts to increase awareness of the EPA Lead-Safe Rule and integrate lead-safe work practices into City housing projects. The City has utilized multiple HUD grants for focused treatment of addressing high risk window components where lead paint content and lead dust levels are extremely high, while the property owner addresses other lead hazards that may be present in the home. In addition, the Health Department provides comprehensive secondary interventions to lead poisoned children and their families and has successfully engaged in community and housing-based primary prevention to prevent lead exposure in areas disproportionately impacted by childhood lead poisoning.

The City's Health Department has developed a comprehensive and nationally recognized program which

includes both secondary interventions (services to lead poisoned children and their families) and primary prevention activities (making high risk housing lead-safe before a child is poisoned).

### **2018 Annual Action Plan - Implementation Strategy**

- Assure compliance with the HUD Lead Safe Housing Rule and EPA Renovation Repair and Painting (RRP) rule by providing information, education and training to property owners.
- Continue to produce lead safe housing units in the high risk target area of the City of Milwaukee utilizing all available funding; provide partial grant subsidies to assure the safe remediation of lead-based paint hazards for high risk window components for housing units.
- Provide investigations and case management to lead-poisoned children and their families in Milwaukee.
- Collaborate with other City agencies; Department of City Development (DCD) and Dept. of Neighborhood Services (DNS), with the goal of increasing lead safe housing that is safe and habitable for Milwaukee families.
- Involve community organizations and members most affected by the problem in neighborhood based strategies.
- Increase the awareness and importance for lead testing of children; minimum of 3 blood lead tests before the age of 3.
- Diversify and increase funding to make homes lead-safe before a child is poisoned. The average cost of lead abatement per housing unit is \$4,000 when working with the property owner to assure no open building code violations and property taxes are current

### **Actions planned to reduce the number of poverty-level families**

The City of Milwaukee's Anti-Poverty Strategy is focused on the expansion of opportunity in the areas of education, employment, economic development and housing. The City has increasingly targeted local and federal resources toward concerted efforts to create jobs and generate economic activity in specific areas of the City affected by years of financial disinvestment. At the same time, City departments are working collaboratively with the non profit sector to advance innovative poverty reduction programs.

### **2019 Actions Planned:**

- Create livable wage jobs through aggressive economic development activities to help reduce the unemployment of Milwaukee residents.
- Assist with training individuals for jobs within emerging industries such as manufacturing, health care, retail/hospitality, information technology, business / financial Services, water, and green economy industries.
- Provide workforce-based training, education and mentoring to increase participants' workforce skills in industry-related certifications or licenses( such as lead abatement, OSHA, home

construction and rehabilitation).

- Increase partnerships with other entities to offer supportive services to workers to promote job stability and retention, such as: job training, apprenticeships, education.
- Support programs that provide skilled trades and high-tech training and those with an apprenticeship component such as Youth Build and Milwaukee Builds which offer housing apprenticeships along with education and supportive services.
- Promote and market the identities of neighborhood retail districts and implement existing improvement plans.
- Assist small businesses and microenterprises with technical assistance and access to capital through business lending and revolving loan programs
- Support transitional jobs programs for released inmates and for offenders diverted from incarceration.
- Generate economic activity directly or "piggyback" employment and economic development activities on social service programs that teach self sufficiency and independence
- Support public transit expansion and other transportation options that connect Milwaukee residents to jobs in outlying areas.
- Support the *Driver's License and Employability Program* to assist low income residents in restoring driver's license privileges and to assist in employment opportunities.
- Expand affordable homeownership opportunities for residents; increase quality affordable rental housing.
- Support programs and initiatives which assist in removing barriers for low income persons such as walk-to-work programs, English proficiency programs and those that provide access to an array of wrap services such as: Health services, social services, education, lifeskills, employment and transportation.
- Pursue new revenue sources and improve efficiency in current programs to maintain existing service levels.
- Work with community partners to improve the physical appearance, social and economic vitality of Milwaukee neighborhoods and commercial districts.
- Promote programs that respond to the social issues facing youth such as: education, unemployment, teen pregnancy, truancy, crime and violence.

### **Actions planned to develop institutional structure**

Many funded activities are under the direct control and funded by the Community Development Grants Administration. These activities are primarily funded by CDBG, HOME, HOPWA and ESG funds. Funded activities will be implemented by the responsible organization and monitored by the CDGA.

### **Activities carried out by Non-City Organizations**

The majority of social service, public service, income transfer, transportation and health services delivered in the City of Milwaukee are administered by non-City organizations. These vital services are

an essential part of the comprehensive community development effort. There is no formal institutional structure to coordinate these disparate services with those delivered by City Departments. The organizations that carry out these services must do so in a manner that will satisfy their funding source. At present, the requirements of the funding source do not necessarily compliment the policies of the City and sometimes contradict the goals and objectives of city-supported activities. The City makes every effort to be involved with non-city organizations, including other non-profit enterprises and for profit businesses, but the City cannot force changes in these services nor can the City create an institutional structure to carry out the Consolidated Plan. The City will continue to work on collaborative efforts with other organizations and continue to communicate the goals and policies of the City.

**Institutional Structure: Annual Action Plan Priorities:**

- Place a high priority on Interdepartmental coordination including collaboration between the City Attorney's Office, the Mayor's Office, the Milwaukee Police Department, the Department of Neighborhood Services and the Department of City Development to reduce the negative impacts of nuisance/blighted and foreclosed properties through the Strong Neighborhoods Plan and the Community Prosecution Program.
- Continue collaborative neighborhood improvement programs involving City departments and community-based agencies such as the Community Prosecution Unit, Neighborhood Clean-ups, City-Wide Housing Coalition and the Health Department Lead Abatement/Prevention Program.
- Coordinate City databases with those of community and other governmental entities to allow citizens and community groups to access the City's database to complete housing condition surveys, obtain information on property ownership, tax delinquency, outstanding building code violations and past rehab activity,([www. Milwaukee.gov](http://www.Milwaukee.gov)).
- Provide public access to data for the public and community-based agencies; technical assistance for community-based agencies in gathering and researching data, internet mapping and data analysis of CDGA-funded activities.
- Continue updates and improvements to CDGA's web site to include pertinent information for community-based agencies and the public.
- Continue to enter into collaborations and partnerships with non-City organizations for planning and program implementation purposes.
- Continue to advocate for additional resources for a coordinated approach to community development and planning to address poverty issues and community renewal initiatives.

**Actions planned to enhance coordination between public and private housing and social service agencies**

The City of Milwaukee is committed to the continued coordination of all community development initiatives. The City will continue to facilitate partnerships between City Departments and community-

based organizations, State and County government, neighborhood residents, businesses, faith-based entities and others in the private sector to efficiently link resources and carry out joint planning and program activities. These linkages include the following City departments: Dept. of City Development, Dept. of Administration/ Community Development Grants Administration, Information and Technology Management Division(ITMD), City Health Department, Dept. of Neighborhood Services, Milwaukee Police Department, Milwaukee Fire Department, Housing Authority, Milwaukee Public Library, Redevelopment Authority, Department of Public Works, Common Council/City Clerk, Comptroller's Office and City Attorney. This spirit of cooperation is further supported by the City's cabinet form of government and is carried out on a daily basis through many channels of communication including meetings, phone conversations, e-mail, and other correspondence.

**Discussion:**

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

#### Introduction:

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	96.00%

#### HOME Investment Partnership Program (HOME)

##### Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City of Milwaukee utilizes local tax levy and private foundation funds to create affordable

housing opportunities.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City will primarily use Recapture Provisions for all its' homebuyer activity, except in cases where the Resale Provisions are required, or when the Presumption of Affordability is requested for a particular project in advance. Recapture and Resale Provisions are clearly defined in the contract between the City and all subrecipients. It is enforced with an active covenant that is secured by a mortgage at time of closing, to ensure affordability of units acquired with HOME funds.

#### **Period of Affordability**

The HOME rule at §92.254(a)(4) establishes the period of affordability for all homebuyer housing. How to calculate the amount of HOME assistance in each unit and therefore the applicable period of affordability varies depending on whether the unit is under resale or recapture provisions.

#### **Period of Affordability Under Resale Provisions**

Under resale, §92.254(a)(5)(i) of the HOME rule states that the period of affordability is based on the *total* amount of HOME funds invested in the housing. Any HOME program income used to assist the project is included when determining the period of affordability under a resale provision.

#### **Period of Affordability Under Recapture Provisions**

For HOME-assisted homebuyer units under the recapture option, the period of affordability is based upon the *direct HOME subsidy* provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability. The following table outlines the required minimum affordability periods.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City will ensure that, when a homebuyer sells his/her property, during the affordability period: the property is sold to another low-income homebuyer who will use the property as their principal residence; the original homebuyer receives a fair return on investment, and the property is sold at a price that is "affordable to a reasonable range of low-income buyers." If the City only provides HOME assistance to develop the unit and HOME funds are not used to lower the purchase price

from fair market value to an affordable price, resale provisions must be used.

**Ensuring Long term Affordability:** If the housing is transferred during the period of affordability, it must be made available for purchase only to a buyer whose family qualifies as low-income, and will use the property as its principal residence.

**Fair Return on Investment:** The City's resale requirements will ensure that, if the property is sold during the period of affordability, the price at resale provides the original HOME-assisted homebuyer a fair return on investment (including the original homebuyer's initial investment and certain capital improvements).

**Presumption of Affordability:** In certain neighborhoods, housing can be presumed to provide a fair return to an original homebuyer upon sale, to be available and affordable to a reasonable range of low-income homebuyers, and to serve as the primary residence of a low-income family during the period of affordability. In such cases, the City will not impose resale restrictions because the characteristics of the neighborhood make it probable that these requirements will be met without the imposition of the restrictions. Instead, §92.254(a)(5)(i)(B) of the HOME rule states that the City may identify certain neighborhoods with housing and income conditions that will:

- 1) Provide ongoing affordable home prices;
- 2) Ensure that the sales price of a home will provide a fair return to the original homebuyer, and
- 3) Provide a pool of income-eligible homebuyers from the residents of the neighborhood.

**Recapture Provisions:** The HOME recapture provisions permit the original homebuyer to sell the property to any willing buyer during the period of affordability while the City is able to recapture all or a portion of the HOME-assistance provided to the original homebuyer. **Recapture Method:** In the event of a voluntary or involuntary transfer of the property during the applicable period of affordability, the City will recapture all or a portion of the direct subsidy provided to the homebuyer. This direct subsidy is provided in the form of a deferred payment 0% interest loan. The loan will be forgiven prorata over the period of affordability (i.e., generally 5 years), as long as the home remains the principal residence of the homebuyer. If the net proceeds from a voluntary or involuntary sale are insufficient to repay the prorated amount of the HOME subsidy, The City shall recapture the balance due on the loan or 100% of net proceeds from the sale, whichever is less. If there are no net proceeds from the sale, no repayment is required.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that



will be used under 24 CFR 92.206(b), are as follows:

Not Applicable

**Emergency Solutions Grant (ESG)  
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

Standard policies and procedures are being developed to ensure proper evaluation of families and individuals for assistance under ESG. Families will initially be evaluated using a standardized evaluation tool. The evaluation tool will be used by 211 or other homeless system point of entry to conduct a cursory assessment to determine demographics, income level, housing status and the determination of which agency will best provide assistance to the family or individual. All individuals that contact 211 will have this assessment completed and will be either directed to a shelter, community case manager, or homeless prevention provider. Once a family has been referred to a shelter, within one week the shelter will assess the family for Rapid Rehousing eligibility. Eligibility will be based on the uniform assessment tool that all agencies will utilize to ensure that each applicant is assessed properly. All individuals must either be homeless, at-risk of homelessness or at imminent risk of homelessness. All individuals involved must not have any other appropriate subsequent housing options identified. Also, individuals must lack the financial resources and support networks to remain in the existing home.

Individuals must also meet ESG income guidelines.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The Milwaukee Continuum of Care established Coordinated Entry in October 2013 after a two-year planning process. Coordinated Entry is sponsored by United Way of Greater Milwaukee and operated by 211 at IMPACT. An ongoing work group functions in an advisory capacity to support implementation.

Coordinated Entry covers all of Milwaukee County. It is a one-call system operated by 211, accessible via phone call, text message, and online. Coordinated Entry is advertised through high-volume sites including churches, meal programs, community centers, and libraries as well as advertised via bus signs, billboards, TV, radio, newspapers, and social media.

Trained staff uses the Coordinated Entry Assessment Tool as a priority ranking method to determine callers in greatest need for emergency shelter and to facilitate referral of other callers to community services to support housing stability. The Assessment Tool gathers the following information: name,

date of birth of all families members, English proficiency, special population (veterans, recently incarcerated, exiting transitional housing, domestic violence, disabling conditions such as substance abuse, mental illness, pregnancy, or other medical/physical disability, special accommodations required to obtain shelter, where stayed previous night, length of stay/ability to stay longer, monthly income, and consent for release of information. In addition, Coordinated Entry has access to HMIS to view callers' service history.

Persons determined to be in greatest need are warm-transferred to emergency shelter. Prevention and supportive services are arranged for those persons whose living situation can be extended pending a permanent housing placement. At this time, Coordinated Entry serves families and single women; expansion is planned to single men in 2014. The goal is for Coordinated Entry to include transitional housing, safe haven, rapid re-housing, and permanent supportive housing to warm transfer options using the VI-SPDAT (Vulnerability Index – Service Prioritization Decision Assistance Tool) to better inform needs and resource matching. Coordinated Entry is a major system improvement for the Continuum of Care that will result in more efficient utilization of homeless services and better outcomes for individuals and families.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

CDGA administers the ESG funds allocated directly to the City of Milwaukee as well as ESG funded awarded to Milwaukee by the State of Wisconsin. For directly allocated ESG, CDGA solicits the recommendations formulated collaboratively by the Shelter Provider Advisory Group, which is affiliated with the Continuum of Care, and the CoC Executive Board in making its ESG recipient selections and allocations. Those recommendations are ratified by the Milwaukee Common Council and the Mayor. For ESG funds awarded to Milwaukee by the State of Wisconsin, there is a local competitive process that begins with community notification of funding availability and invitation to apply. Selected projects are included in a consolidated application prepared by CDGA as Lead Agency for the Continuum of Care. The application is submitted to the Wisconsin Division of Housing. CDGA administers contracts with recipients/sub-recipients for both ESG allocations. ESG reporting and performance evaluation is conducted by means of Performance Activity Reports/HMIS completed by each organization and submitted monthly to CDGA. ESG priorities are aligned with the CoC's 10-Year Plan, Consolidated Plan, and Housing and Service System Plan.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The Continuum of Care regularly solicits input from homeless individuals and families via the semi-annual Point in Time survey. Survey results are used to prioritize needs, develop program initiatives, and evaluate progress over time. In addition, the CoC has several members who have the lived

experience of having been homeless, many are veterans who are active in one of the CoC's six veterans services organizations. Guest House, an organization operating emergency shelter, transitional housing, and permanent supportive housing, sponsors a group of former consumers called Living Proof. This group meets regularly to advise Guest House on policies and programs and to provide insight and advice to the Continuum of Care. On the community level, an increasing number of persons with lived experience in the areas of mental illness and substance abuse as well as having experienced periods of homelessness have become active in entities associated with the Continuum of Care including the Milwaukee County Mental Health Redesign Task Force, MC3, and the peer support specialist movement. Twenty peer support specialists with diverse lived experience are currently employed by Milwaukee County-operated CoC-funded Permanent Supportive Housing programs.

5. Describe performance standards for evaluating ESG.

As the Lead Agency of the Continuum of Care, CDGA has a signed MOU with each CoC/ESG program authorizing access of program documents to address program quality, expenditures, and compliance reporting. If needed, the Lead Agency can recommend participation in performance improvement including training and additional reporting. The MOU is enforced through review of each program's APR (Annual Performance Report) and data quality reviews conducted by the Continuum of Care HMIS (Homeless Management Information System) and shared with the Lead Agency. Annual performance reviews are conducted for renewal program rating and ranking. Monthly performance reports are required by CDGA of all funded groups in conformance with the new HUD Statutory Program Outcomes. The results provide a monthly performance scorecard. Funded agencies also submit semi-annual and year-end reports detailing accomplishments along with backup documentation. HUD performance goals are incorporated into all levels of compliance monitoring. The Lead Agency (CDGA) monitoring staff maintains extensive contact with funded agencies and provides technical assistance to ESG-funded groups when needed. Agencies needing additional technical assistance are referred to the Nonprofit Center of Milwaukee (NPC) which is under contract to CDGA to provide individual consultation to programs and provide a comprehensive calendar of nonprofit management training opportunities. When longer term technical assistance is required, CDGA provides ongoing guidance necessary to correct deficiencies and strengthen overall project capacity. A critical step in improving performance has been the implementation of a clear, objective performance measurement system (PMS) which allows projects to assess their progress relative to other Milwaukee projects and HUD performance goals. The PMS also allows technical assistance to be specifically targeted to deficiencies and provides documentation necessary to administer funding sanctions in response to uncorrected poor performance. HUD technical assistance is available for longer term technical assistance project which involve a level of complexity that exceeds available CDGA and Nonprofit Center capacity. The City will continue to conduct formal and informal site reviews of CDGA-funded programs as well as perform risk assessments and in-house desk audits of those programs. CDGA will receive fiscal guidance from the City Comptroller's Office, the fiscal arm of CDGA, when reviewing those agencies'

financial documents and expenditures. While at this point, CDGA's authority does not extend to this level of monitoring for all CoC grants, ESG-funded agencies have complied with monitoring by CDGA as part of its Lead Agency responsibilities. On-site monitoring, tracking of progress on performance goals, and reporting out to the Continuum of Care as a whole are major improvements for the Milwaukee CoC, instituted in 2012-13, which enable the identification of technical assistance needs and capacity-building initiatives for the future.

## Attachments

## Citizen Participation Comments

### Citizen Participation Plan Amendment

Due to the Coronavirus pandemic the City of Milwaukee Community Development Grants Administration submitted a waiver request, on May 4, 2020, to amend the Citizen Participation Plan requiring 30 days notice to comment, reducing the comment period to 5 days.

Given the unprecedented economic disruptions caused by the COVID-19 pandemic, we may need to expeditiously reprogram CDBG funds to activities that more directly meet the immediate community needs, including reprogramming funds to cover increased administrative costs or away from other activities. Requiring these the City to complete the required public comment period would cause undue delays in the face of urgent and growing need. The City must have the ability to respond immediately to the unprecedented public need caused by the COVID-19 pandemic.

The City of Milwaukee will provide citizens with reasonable notice and opportunity to comment. The City will continue to do one or more of the following: to place ad's in the newspaper, post notifications on the CDGA website, send out email blast, and host public meetings/hearings where funding allocations will be discussed and approved by the Common Council.

**City of Milwaukee  
Community Development Grants Administration  
HUD Mega-Waiver Request Form for the  
Community Development Block Grant (CDBG) Program**

In response to the COVID-19 pandemic, HUD released a memorandum which explained the availability of waivers of certain regulatory requirements associated with several Community Planning and Development (CPD) grant programs to prevent the spread of COVID-19 and to facilitate assistance to eligible communities and households economically impacted by COVID-19. The memorandum also announces a simplified notification process for recipients of these programs to use this waiver flexibility to expedite the delivery of assistance. CPD Field Office Directors, Deputy Directors, and Program Managers are instructed to inform CPD recipients operating within their jurisdictions of the content of this memorandum.

The City of Milwaukee Community Development Grants Administration (CDGA) wishes to utilize the waiver(s) provided in the memorandum.

The City of Milwaukee—Community Development Grants Administration will provide notification, as the HUD Grantee, to the HUD established CPD Field Office via email addresses as directed by HUD. This document shall be placed in the HUD file as documentation of the request for the waiver.

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**Participating Jurisdiction Name:** City of Milwaukee

**CDBG Program Year(s):** 2019, 2020

**Requestor Name:** Steven Mahan **Date of Request:** 05/04/2020

**Requestor contact number:** (414) 266-3843 **Email:** Steven.mahan@milwaukee.gov

**Program Type waiver will be applied to:** Citizen Participation Reasonable Notice and Opportunity to Comment

**Requirement:** 30 Days Notice to Comment

**Citations:** 24 CFR 91.105(c)(2) and (k) (Local governments), 24 CFR 91.115(c)(2) and (i) (States), and 24 CFR 91.235(e) (Insular areas) 24 CFR 91.401 (Consortia)

**Explanation:** The regulations at 24 CFR 91.105(c)(2) and (k) (Local governments), 24 CFR 91.115(c)(2) and (i) (States), 24 CFR 91.235(e) (Insular Areas), and 24 CFR 91.401 (Consortia) set forth the citizen participation requirements for PJs. For substantial amendments to the consolidated plan, the regulations require the PJ to follow its citizen participation plan to provide citizens with reasonable notice and opportunity to comment. The citizen participation plan must state how reasonable notice and opportunity to comment will be given. This waiver will permit PJs amending their plans as a result of the COVID-19 pandemic to reduce the comment period to 5 days.

**Justification:** Given the unprecedented economic disruptions caused by the COVID-19 pandemic, PJs may need to expeditiously reprogram CDBG funds to activities that more directly meet their immediate community needs, including reprogramming funds to cover increased administrative costs or away from other activities. Requiring these PJs to complete the required public comment period would cause undue delays in the face of urgent and growing need. PJs must have the ability to respond immediately to the unprecedented public need caused by the COVID-19 pandemic.

(4/16/2020)

**Applicability:** This waiver is in effect for any necessary substantial amendments to FY 2019 & 2020 consolidated plans or action plans

**Anticipated Waiver begin date:** 05/07/2020

(4/16/2020)



# City of Milwaukee: Citizen Participation Plan

## **COMMUNITY DEVELOPMENT GRANTS ADMINISTRATION**

### **CITIZEN PARTICIPATION PROCESS FOR THE USE OF FEDERAL FUNDS**

#### **Citizen Participation 91.200 (b)**

**Lead Agency:** The agency responsible for oversight and monitoring of these Federal funds and ensuring that these activities are implemented is the Community Development Grants Administration. The oversight body for CDGA is the City of Milwaukee Community and Economic Development Committee (CED) of the Milwaukee Common Council. All actions taken by the Committee are ratified by the Milwaukee Common Council and the Mayor. CDGA annually solicits and evaluates applications from all interested parties through an open and competitive Request For Proposal (RFP) process. The funding categories for the RFP process receive input from the community at large and are finalized by the CED Committee and Mayor. Recommendations for annual funding are made to the Community and Economic Development Committee for approval with final ratification by the Milwaukee Common Council and Mayor.

In accordance with the regulations of the U.S. Department of Housing and Urban Development and in an effort to ensure adequate and accessible citizen participation, the City of Milwaukee adopted a Citizen Participation Plan, which was reviewed and approved by the Common Council of the City of Milwaukee on April 23, 1991. This plan outlines the procedures and processes used by the City to solicit citizen input and has been submitted to and approved by the U.S. Department of Housing and Urban Development.

The City's Citizen Participation Plan requires public hearings to obtain citizen input on funding proposals and inquiries at all stages of the community development program, including the Consolidated Plan and Annual Funding Allocation Plan (FAP) and review of proposed activities and program performance. The FAP is meant to define the City's community development needs and funding priorities as it relates to the use of Federal funds. Essentially the FAP is the basis for the Request for Proposal process. The FAP is reviewed annually through public hearings and amended where appropriate, as needs within the community change. Broad-based citizen and community input by stakeholders is strongly encouraged and solicited.

Over the years, the City of Milwaukee has used its Federal entitlement funds to creatively respond to community needs and to enable neighborhood residents, businesses and other community stakeholders to achieve the highest possible quality of life. Community-based organizations are essential to these goals for responding to community needs and for strengthening the social and economic infrastructure of Milwaukee's neighborhoods and their efforts are also coordinated with City agencies which have the same mission.

Relative to the allocation of funds, the City of Milwaukee places the highest priority on those programs which directly serve low and moderate income persons (defined as those with incomes of 80% or less of Milwaukee's median income). Priority is also given to those projects which serve residents of the Neighborhood Revitalization Strategy Areas (NRSAs), of which at least 70% of all residents are considered low income.

#### **City's Notification Requirement Regarding Draft Plan Availability**

A notification will be advertised in local newspapers of general circulation to inform the public that a draft Consolidated Plan, or draft Annual Action Plan is available to review and subject to public comment. The notification will describe the contents and purpose of the particular plan. The notice will also be posted on the City's website <http://city.milwaukee.gov/CDGA>.

The public notice will state that copies of the particular Plan may be available for review in various formats such as: City's website, City libraries, the City's Legislative Bureau and the offices of CDGA. Hard copies will also be available upon request.

The City will make the Plan(s) public, and upon request in a format accessible to persons with disabilities. The City will provide citizens a reasonable opportunity to comment on the Plan, and on any amendments to the Plan as defined by this Citizen Participation Plan. The City will consider any comments or views of citizens received in writing, or orally, at any of the public hearings, or during the 30-day public review and will address those comments in the Plan.

In preparation of the final Consolidated Plan, or Annual Action Plan, the City will include any written or oral comments on the plans in the final submission to HUD.

#### **Criteria for Substantial Amendments to the Consolidated Plan and Annual Action Plan**

The City of Milwaukee shall prepare a substantial amendment to its Consolidated Plan and/or Annual Action Plan(s) plan using the following criteria:

- 1) Whenever eligible activity categories proposed for funding are not listed in the City's current Consolidated Plan or Annual Action Plan;
- 2) Whenever there is a change in the purpose, scope, location or beneficiaries of an activity.

If there are amendments to the Consolidated Plan and/or Annual Action Plan(s), the City of Milwaukee will solicit citizen participation, including public hearings, in conformance with its Citizen Participation Plan.

#### **Performance Reports**

Further citizen involvement may be affected by the provision of Accomplishment Reports that identify the annual goals of each program funded and the status of the activities annually. This allows concerned citizens and other stakeholders the opportunity to determine if program operators working in their planning areas are delivering the services as funded.

As required by HUD, a Consolidated Annual Performance and Evaluation Report (CAPER) will be submitted to HUD by March 31<sup>st</sup> following the end of each program year which ends on December 31<sup>st</sup>. The CAPER provides an actual account of activities, accomplishments and expenditures, which occurred during the previous program year.

The City will publish a notice in local newspapers regarding the availability of the CAPER, which will

begin the 30-day review and comment period. The notice and the draft CAPER may also be made available to the public via the City's website, City libraries, Legislative Reference Bureau, CDGA offices and to interested persons who request a copy of the report.

Upon completion of the CAPER and prior to its submission to HUD, the City will make the report available to the general public for a (30) day review and comment period. Any comments received from the general public will be included in Final CAPER submitted to HUD.

The Community & Economic Development Committee will hold a hearing on the CAPER. Each public hearing notice will include the availability of an interpreter if requested by non-English speaking or hearing-impaired persons that expected to participate at the hearing.

#### **Citizen Complaints**

CDGA has an internal system for responding to citizen complaints and concerns in a timely manner (generally, within 15 working days where practicable). Program Officers are available to meet with clients that present themselves at the CDGA offices. A written report is formulated when the issues are of a substantive nature and resolution is not achieved during the initial meeting.

Staff will follow-up on substantive issues and provide written responses to the complainant and if necessary, provide copies of these responses to the affected organizations. Staff will track the ensuing process and analyze feedback from the parties concerned to determine viable resolution.

#### **Access to Information for Limited & Non-English Speaking Persons**

To ensure access to information for all residents, current CDGA staff includes two bilingual persons (English-Spanish) who make themselves available in-house or at public hearings where some large segments of the population speak only Spanish. With our large Asian-American population, CDGA has access to Hmong-Laotian interpreters through its linkage with the Hmong American Friendship Association (HAFA).

Finally, several funded agencies have attained status as a Community-Based Development Organization (CBDO). The CBDO designation mandates that Boards of Directors of these organizations consist of not only citizens of the target area, but area business owners and other stakeholders, such as schools and churches. That directive broadens diverse community input and is in keeping with CDGA's philosophy of increasing resident participation in development of neighborhood strategies and all planning processes.



**PUBLIC NOTICE OF AVAILABILITY**

**2020 PROPOSED FUNDING ALLOCATION PLAN FOR  
THE CORONAVIRUS AID, RELIEF, AND ECONOMIC SECURITY ACT**

**CITY OF MILWAUKEE  
COMMUNITY DEVELOPMENT PROGRAM**

In accordance with the regulations of the U.S. Department of Housing and Urban Development and in an effort to ensure adequate and accessible citizen participation the City of Milwaukee solicits the input and participation of citizens and interested parties.

**Funding Allocation Plan for proposed funding for CARES Act.**

The Community and Economic Development Committee will take action on the 2020 Allocation at its' meeting on **Wednesday, May 13, 2020; 1:30 pm**. Due to the Stay at Home Order and social distancing requirements the meeting will be held virtually and can be viewed on City Channel 25 or <https://city.milwaukee.gov/cityclerk/CityChannel#.XrY6OGZYuLI>. The Milwaukee Common Council will take action on **Tuesday, May 27, 2020, at 9:00 am**, under the same protocols.

The public comment period for review of the Funding Allocation Plan is from ***May 9, 2020 through May 27, 2020***. Any written comments received will be forwarded to HUD, as required by Federal regulations. Copies of Funding Allocation Plan are available beginning May 9, 2020 at the Community Development Grants Administration website [Milwaukee.gov/CDGA](http://Milwaukee.gov/CDGA).

COMMUNITY DEVELOPMENT GRANTS  
200 E WELLS ST  
MILWAUKEE, WI, 53202-3515

STATE OF WISCONSIN

I hereby state that I am authorized by Journal Media Group to certify on behalf of Journal Sentinel Inc., publisher of the Milwaukee Journal Sentinel and The Sunday Journal Sentinel, public newspapers of general circulation, printed and published in the city and county of Milwaukee; published in the Daily Edition of the Milwaukee Journal Sentinel on 05/09/2020; that the Milwaukee Journal Sentinel and The Sunday Journal Sentinel are newspapers printed in the English language and that said printed copy was taken from said printed newspaper(s).

*[Signature]*

Legal Clerk

State of Wisconsin  
County of Brown  
Subscribed and sworn to before on May 9, 2020

*[Signature]*

Notary Public State of Wisconsin, County of Brown

8-25-23

My Commission Expires

Account # 1539479  
Total Amount of Claim: \$46.54  
# of Affidavits: 1  
This is not an invoice

SHELLY HORA  
Notary Public  
State of Wisconsin

PUBLIC NOTICE OF AVAILABILITY  
2020 PROPOSED FUNDING  
ALLOCATION PLAN FOR  
THE COMMUNITY AND SENIOR  
AND ECONOMIC SECURITY ACT  
CITY OF MILWAUKEE  
COMMUNITY DEVELOPMENT  
PROGRAM  
In accordance with the regulations of the  
U.S. Department of Housing and Urban  
Development and in an effort to ensure  
adequate and accessible career paths  
within the City of Milwaukee and the  
public participation of citizens and in-  
terested parties.  
Funding Allocation Plan for proposed  
funding for CARES Act.  
The Community and Economic Develop-  
ment Committee will take action on the  
2020 Allocation Plan meeting on Wed-  
nesday, May 13, 2020, 1:30 pm. The  
City of Milwaukee Order and read-  
ing requirements for the meeting will  
be held virtually and can be viewed on  
City Channel 28 or through the following  
link: <https://www.milwaukee.gov/CommunityDevelopment>  
The Milwaukee General Council will  
take action on Tuesday, May 27, 2020,  
at 10:00 am, under the same protocols.  
The public comment period for review of  
the Funding Allocation Plan is from May  
3, 2020 through May 27, 2020. Any  
written comments received will be for-  
warded to H.U.D. as required by federal  
regulations. Copies of Funding Allo-  
cation Plan are available beginning May 3,  
2020 at the Community Development  
Office. Administration website  
Milwaukee.gov/2020  
Run May 8, 2020 WPH/PLP



## City of Milwaukee

City Hall  
200 East Wells Street  
Milwaukee, WI 53202

### Meeting Agenda

#### COMMUNITY & ECONOMIC DEVELOPMENT COMMITTEE

**ALD. KHALIF J. RAINEY, CHAIR**  
*Ald. JoCasta Zamarripa, Vice-Chair*  
*Ald. Nikiya Dodd, Ald. Chantle Lewis, and Ald. Russel W. Stamps, II*

*Staff Assistant, Linda Elmer, 286-2231*  
*Fax: 286-3456, [lelmer@milwaukee.gov](mailto:lelmer@milwaukee.gov)*  
*Legislative Liaison, Ted Medhin, 286-8681,*  
*[tmedhi@milwaukee.gov](mailto:tmedhi@milwaukee.gov)*

Wednesday, May 13, 2020

1:30 PM

Room 301-B, City Hall

This is a virtual meeting. Those wishing to view the proceedings are able to do so via the City Channel - Channel 25 on Spectrum Cable - or on the Internet at <http://city.milwaukee.gov/citychannel>.

1. 191748 Appointment of Oslaveeya Tye to the Business Improvement District #48 by the Mayor. (9th Aldermanic District)  
*Sponsors: THE CHAIR*
2. 191747 Appointment of Michael Poe to the Business Improvement District #48 by the Mayor. (9th Aldermanic District)  
*Sponsors: THE CHAIR*
3. 191684 Reappointment of Greg Uhen to the Business Improvement District #2 by the Mayor. (4th Aldermanic District)  
*Sponsors: THE CHAIR*
4. 191749 Reappointment of Tim Hanson to the Business Improvement District #48 by the Mayor. (9th Aldermanic District)  
*Sponsors: THE CHAIR*
5. 191952 Resolution relative to acceptance and expenditure of a Wisconsin Arts Board 2020 Regranting Program Grant.  
*Sponsors: Ald. Murphy*
6. 191947 Resolution relating to the acceptance and funding of the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act") (Pub. L. No. 116-138) for Community Development Block Grant-CV, Emergency Solutions Grant-CV and Housing Opportunity for Persons With AIDS-CV from the U. S. Department of Housing and Urban Development through the Community Development Grants Administration.  
*Sponsors: THE CHAIR*

7. 191629 Communication from the Department of Public Works and Dept. of Administration - Office of Small Business relating to the residents preference program goals and the remedies if contractors fail to meet these goals in 2020.

Sponsors: THE CHAIR

This meeting will be webcast live at [www.milwaukee.gov/channel25](http://www.milwaukee.gov/channel25).

In the event that Common Council members who are not members of this committee attend this meeting, this meeting may also simultaneously constitute a meeting of the Common Council or any of the following committees: Community and Economic Development, Finance and Personnel, Judiciary and Legislation, Licenses, Public Safety and Health, Public Works, Zoning, Neighborhoods & Development, and/or Steering and Rules. Whether a simultaneous meeting is occurring depends on whether the presence of one or more of the Common Council member results in a quorum of the Common Council or any of the above committees, and, if there is a quorum of another committee, whether any agenda items listed above involve matters within that committee's realm of authority. In the event that a simultaneous meeting is occurring, no action other than information gathering will be taken at the simultaneous meeting.

Times for specific agenda items are estimations. If items cannot be heard at their specified times, they will be heard as soon as practicable thereafter.

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Persons engaged in lobbying as defined in s. 305-43-4 of the Milwaukee Code are required to register with the City Clerk's License Division. Lobbyists appearing before a Common Council committee are required to identify themselves as such. More information is available at <http://city.milwaukee.gov/Lobbying>.





Community Development Block Grant  
Coronavirus  
(CDBG-CV1, ESG-CV1 & HOPWA-CV1)  
Funding Overview

May 26, 2020; Community and Economic Development Committee  
City Hall, Milwaukee, WI

## CARES Act Community Planning and Development Funding to Date

Community Planning and Development  
Funding to Date



Community Planning and Development  
Funding to Date

Community Planning and Development  
Funding to Date

Community Planning and Development  
Funding to Date

Community Planning and Development  
Funding to Date

CARES Act funds must be used for activities that  
prevent, prepare for, and respond to public health

## CDBG-CV Overview



- ❖ **WHAT?** Special allocation of Community Development Block Grant (CDBG) funding to prevent, prepare for, and respond to the coronavirus (COVID-19).
- ❖ **WHO?** CDBG-CV funding provided to City by U.S. Department of Housing and Urban Development (HUD) on formula basis.
- ❖ **AMOUNT?** \$9,574,616
- ❖ **PURPOSE?** CDBG-CV projects must meet one of three National Objectives: **1)** Benefit Low- to Moderate-Income Persons/Households; **2)** Aid in the Prevention/Elimination of Slum and Blight; or **3)** Meet an Urgent Need

3

# CDBG-CV Overview



## ❖ CDBG-CV vs. CDBG FUNDS?

- CDBG-CV funds must **ONLY** to be used for eligible activities related to COVID-19
- **No percentage caps for allocation of funding!** Funding is equally available to all categories, **including Public Services**
- Substantial Amendment will be required for use of CDBG-CV funds
- If necessary, PY2019 and PY2020 CDBG funding may be re-allocated for eligible COVID-19 activities
- **SUBJECT TO CHANGE:** additional Federal guidelines are pending

4

# CDBG-CV Overview



## U.S. Department of Housing and Urban Development (HUD) 2020 Income Limits

CATEGORY	NUMBER OF PERSONS IN HOUSEHOLD							
	1	2	3	4	5	6	7	8
Extremely Low *	\$17,650	\$20,150	\$22,650	\$25,150	\$27,200	\$29,200	\$31,800	\$33,200
Very Low (50%)	\$29,350	\$33,550	\$37,750	\$41,900	\$45,300	\$48,650	\$52,000	\$55,350
Low (80%)	\$46,850	\$53,650	\$60,350	\$67,050	\$72,450	\$77,800	\$83,150	\$88,500

\* Extremely Low income is defined as the great of 30/50ths (60%) of the Section 8 very low-income limit or the poverty guidelines provided that this amount is not greater than the Section 8 50% very low-income limit.

5

# CDBG-CV Overview



## ❖ EXAMPLES OF ELIGIBLE ACTIVITIES?

- Emergency rent/utility assistance
- Food distribution
- Provide testing, diagnosis or other services at a fixed or mobile location
- Provide short-term working capital assistance to small businesses to enable retention of jobs held by low- and moderate-income persons
- Construct a facility for testing, diagnosis, or treatment
- Rehabilitate a community facility to establish an infectious disease treatment clinic
- **FOR CITY USE ONLY:** Gather data and develop non-project specific emergency infectious disease response plans

6

## CDBG-CV Overview



### ❖ EXAMPLES OF ELIGIBLE APPLICANTS?

- Existing 501(c)(3) or Other Non-Profit Status
- Other Public Agencies
- For-Profits with Mission to Serve Low- to Moderate-Income Persons/Families
- Small Businesses with Low- to Moderate-Income Employees
- City Departments
- Community Housing Development Organizations(CHDO)
- Community Development Financial Institutions (CDFI)

7

## Emergency Shelter Grant-CV Overview



- ❖ **WHAT?** Special allocation of Emergency Solutions Grant (ESG) funding to prevent, prepare for, and respond to the coronavirus (COVID-19).
- ❖ **WHO?** ESG-CV funding provided to City by U.S. Department of Housing and Urban Development (HUD) on formula basis.
- ❖ **AMOUNT?** \$4,785,445
- ❖ **PURPOSE?** ESG-CV projects must address individuals, families and youth experiencing homelessness. Funds shall be used to provide essential supplies and services to reduce the spread of infectious disease in homeless programs.

8



# ESG-CV Overview



## ❖ EXAMPLES OF ELIGIBLE ACTIVITIES?

- Emergency Shelter
  - Supplies, Furnishings, Equipment and Transportation
- Street Outreach
  - Engagement- Urgent physical needs
  - Engagement- Equipping Staff
- Homeless Prevention
  - Financial Assistance – Rental arrears, utilities and security deposits
- Hazard pay

9

## Housing Opportunity for Persons with AIDS-CV Overview



- ❖ **WHAT?** Special allocation of Housing Opportunities for Persons with AIDS (HOPWA) funding to prevent, prepare for, and respond to the coronavirus (COVID-19).
- ❖ **WHO?** HOPWA-CV funding provided to City by U.S. Department of Housing and Urban Development (HUD) on formula basis.
- ❖ **AMOUNT?** \$142,391

**PURPOSE?** HOPWA-CV projects must assist HOPWA eligible households in accessing essential services and supplies.

10

# HOPWA-CV Overview



## ❖ EXAMPLES OF ELIGIBLE ACTIVITIES?

- Supportive Services
  - Food, medications, Transportation
- Leasing
  - Cost for short-term hotel/motel stays for use as quarantine spaces
- Operating Costs for Housing Facilities
  - Essential furnishings, maintenance, equipment that support the operation of housing facilities.
- Hazard pay

11



## City of Milwaukee

City Hall  
200 East Wells Street  
Milwaukee, WI 53202

### Meeting Agenda

#### COMMUNITY & ECONOMIC DEVELOPMENT COMMITTEE

ALD. KHALIF J. RAINEY, CHAIR  
Ald. JoCasta Zamarripa, Vice-Chair  
Ald. Nikiya Dodd, Ald. Chantia Lewis, and Ald. Russell W.  
Stamper, II

Staff Assistant, Linda Elmer, 286-2231  
Fax: 286-3458, [lelmer@milwaukee.gov](mailto:lelmer@milwaukee.gov)  
Legislative Liaison, Ted Medhin, 286-8681,  
[tmedhi@milwaukee.gov](mailto:tmedhi@milwaukee.gov)

Thursday, October 29, 2020

8:30 AM

City Hall, Room 301-A

**Special Meeting.** This is a virtual meeting. Those wishing to view the proceedings are able to do so via the City Channel - Channel 25 on Spectrum Cable - or on the Internet at <http://city.milwaukee.gov/citychannel>

1. 200812 Substitute resolution relative to the funding of the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act") (Pub. L. No. 116-136) for Community Development Block Grant-CV from the U. S. Department of Housing and Urban Development through the Community Development Grants Administration.  
Sponsors: THE CHAIR
2. 200813 Substitute resolution relative to the establishment of the Year 2021 Funding Allocation Plan  
Sponsors: THE CHAIR  
*Those wishing to comment on this item are encouraged to use the City's eComment system available by accessing this agenda at <http://milwaukee.legistar.com/calendar>.*

---Note: If action is taken on either or both of these files, it or they may be referred to the Common Council for action at its regular meeting to be held at 9:00 a.m. on Wednesday, November 4, 2020.

This meeting will be webcast live at [www.milwaukee.gov/channel25](http://www.milwaukee.gov/channel25).

In the event that Common Council members who are not members of this committee attend this meeting, this meeting may also simultaneously constitute a meeting of the Common Council or any of the following committees: Community and Economic Development, Finance and Personnel, Judiciary and Legislation, Licenses, Public Safety and Health, Public Works, Zoning, Neighborhoods & Development, and/or Steering and Rules. Whether a simultaneous meeting is occurring depends on whether the presence of one or more of the Common Council member results in a quorum of the Common Council or any of the above committees, and, if there is a quorum of another committee, whether any agenda items listed above involve matters within that committee's realm of authority. In the event that a simultaneous meeting is occurring, no action other than information gathering will be taken at the simultaneous meeting.

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---

**Higgins, Mario**

**From:** Elmer, Linda  
**Sent:** Thursday, October 22, 2020 11:20 AM  
**To:** Dodd, Nikiya; Doherty, Patricia; Elizey, Dameon; Lasley, Wayne; Lewis, Chantia; Moore, Deborah; Rainey, Khalif; Stamper II, Russell; Venus, Danielle; Zamarripa, JoCasta  
**CC:** Mehan, Steven; Higgins, Mario  
**Subject:** The special CED will take place at 8:30 on October 29th - agenda and video link  
**Attachments:** agenda1029.pdf

It is hoped this meeting will only last an hour or so, so members can participate in Budget Amendment Day (the MOST glorious day of all – second only to Christmas!) Although it is a Sad Christmas this year.

**Community & Economic Development Committee 10/29/20 at 8:30am**

Thu, Oct 29, 2020 8:30 AM - 1:30 PM (CDT)

**Please join my meeting from your computer, tablet or smartphone.**

<https://global.gotomeeting.com/join/735987541>

**You can also dial in using your phone.**

United States: +1 (872) 243-3212

**Access Code:** 735-987-541

**Join from a video-conferencing room or system.**

Dial in or type: 67.217.95.2 or [invoimlink.goto.com](https://invoimlink.goto.com)

Meeting ID: 735 987 541

Or dial directly: [735987541@67.217.95.2](https://global.gotomeeting.com/join/735987541) or 67.217.95.2##735987541

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**PUBLIC NOTICE OF AVAILABILITY  
CITY OF MILWAUKEE**

**COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM**

**PROPOSED FUNDING RECOMMENDATION**

The City of Milwaukee - Community Development Grants Administration (CDGA) is making funding recommendations for multiple Federal sources including: Community Development Block Grant, Home Investment Partnership, Housing Opportunities for Persons With AIDS, and the Coronavirus Aid, Relief, and Economic Securities Act.

In accordance with the regulations of the U.S. Department of Housing and Urban Development and in an effort to ensure adequate and accessible citizen participation, the City of Milwaukee solicits the input and participation of citizens and interested parties.

The Community & Economic Development Committee will meet on **Wednesday, July 22, 2021 at 1:30 pm at City Hall - Room 301-B** to take up the recommendations. The meeting will be held virtually as well and can be viewed on City Channel 25 or [https://city.milwaukee.gov/cityclerk/CityChannel#\\_XrV6OGZYaU](https://city.milwaukee.gov/cityclerk/CityChannel#_XrV6OGZYaU). The Milwaukee Common Council will take action on Tuesday, July 27, 2021, at 9:00 am.

**PLEASE NOTE:** Upon reasonable notice, efforts will be made to accommodate the needs of disabled individuals through sign language interpreters or other auxiliary aids. For additional information or to request this service, contact the Council Services Division ADA Coordinator at 286-2231, (FAX) 286-3456, (TDD) 286-2025, or by writing to the Coordinator at City Hall, 200 East Wells Street, Room 205 Milwaukee, WI 53202.



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Account	Ad#	Net Amount	Tax Amount	Total Amount	Payment Method	Payment Amount	Amount Due
1609679	000482967	\$452.83	\$0.00	\$452.83	Invoice	\$0.00	\$452.86
Sales Rep: TVWoodrum		Order Taken: TVWoodrum		Order Created: 07/19/2021			
Product	# Ins	Column	Agate Lines	Lines	Start Date	End Date	
MJS-Journal Sentinel	1	1.00	52	52	07/20/2021	07/20/2021	
MJS-JSOnline.com	1	1.00	52	52	07/20/2021	07/20/2021	

\* ALL TRANSACTIONS CONSIDERED PAID IN FULL UPON CLEARANCE OF FINANCIAL INSTITUTION

**Text of Ad:** 07/19/2021

**PUBLIC NOTICE OF AVAILABILITY  
CITY OF MILWAUKEE  
COMMUNITY DEVELOPMENT BLOCK  
GRANT PROGRAM  
PROPOSED FUNDING  
RECOMMENDATION**

The City of Milwaukee - Community Development Grants Administration (CDGA) is making funding recommendations for multiple Federal sources including Community Development Block Grant, Home Investment Partnership, Housing Opportunities for Persons With AIDS, and the Coronavirus Aid, Relief, and Economic Security Act.

In accordance with the requirements of the U.S. Department of Housing and Urban Development and in order to ensure openness and access to the decision-making process, the City of Milwaukee solicits the input and participation of citizens and interested parties.

The Community & Economic Development Committee will meet on Wednesday, July 28, 2021 at 1:00 pm at City Hall - Room 201B to hear up to 10 recommendations. The meeting will be held virtually as well and can be viewed on City Channel 56 or livestreamed on [www.cityofmilwaukee.gov/CDGA](https://www.cityofmilwaukee.gov/CDGA). The Milwaukee Common Council will take action on Tuesday, July 27, 2021, at 9:00 am.

**PLEASE NOTE:** Upon receipt of a request, all requests will be made to recommendations for needed disabled individuals through sign language interpretation or other auxiliary aids. For additional information or to request the service, contact the Council Services Division ADA Coordinator at 312-223-1111 (TDD) or 312-223-1111 (VO) or by writing to the Coordinator at City Hall, 200 South Wells Street, Room 205 Milwaukee, WI 53202.  
Thank you,  
Frank July 20, 2021 WCAKLP





## City of Milwaukee

City Hall  
200 East Wells Street  
Milwaukee, WI 53202

### Meeting Agenda

#### COMMUNITY & ECONOMIC DEVELOPMENT COMMITTEE

**ALD. KHALIF J. RAINEY, CHAIR**

**Ald. JoCasta Zamarripa, Vice-Chair**

**Ald. Nikiya Dodd, Ald. Chantia Lewis, and Ald. Russell W. Stamper, II**

**Staff Assistant, Linda Eimer, 286-2231**

**Fax: 286-3436, [leimer@milwaukee.gov](mailto:leimer@milwaukee.gov)**

**Legislative Liaison, Ted Medhin, 286-8681,  
[tmedhin@milwaukee.gov](mailto:tmedhin@milwaukee.gov)**

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Monday, July 26, 2021

1:30 PM

City Hall, Room 301-B

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**Special.** This is also a virtual meeting. Those wishing to view the proceedings are able to do so via the City Channel - Channel 25 on Spectrum Cable or on the Internet at <https://city.milwaukee.gov/cityclerk/CityChannel>

--Note: If action is taken on some or all of the files listed below, they may be referred to the Common Council for action at its regular meeting to be held at 9:00 a.m. on Tuesday, July 27th, 2021.

1. 210114 Substitute resolution relative to changes in the 2021 HUD funding for Community Development Block Grant, HOME Investment Partnership, Emergency Solutions Grant and Housing Opportunities for Persons With AIDS.  
*Sponsors:* THE CHAIR
2. 210115 Substitute resolution relating to the use and allocation of Community Development Block Grant 2021 reprogramming funds.  
*Sponsors:* THE CHAIR
3. 210147 Substitute resolution relating to the use and allocation of HOME Investment Partnership 2021 reprogramming funds.  
*Sponsors:* THE CHAIR
4. 210149 Substitute resolution relating to the use and allocation of Housing Opportunities for Persons With AIDS (HOPWA) 2021 reprogramming funds.  
*Sponsors:* THE CHAIR

5. 210283 Substitute resolution relative to the funding of the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act") (Pub. L. No. 116-136) for Community Development Block Grant-CV3 from the U. S. Department of Housing and Urban Development through the Community Development Grants Administration.  
*Sponsors:* THE CHAIR
6. 210438 Substitute resolution relative to the funding of the Coronavirus Aid, Relief, and Economic Security Act ("CARES Act") (Pub. L. No. 116-136) for Emergency Solutions Grant-CV2 from the U. S. Department of Housing and Urban Development through the Community Development Grants Administration.  
*Sponsors:* THE CHAIR
7. 210548 Substitute resolution relative to the acceptance and funding of the year 2021 State of Wisconsin Emergency Solution Grant.  
*Sponsors:* THE CHAIR
8. 210542 Resolution relative to the funding of the American Rescue Plan - HOME Investment Partnership Program (HOME-ARP) from the U. S. Department of Housing and Urban Development through the Community Development Grants Administration.  
*Sponsors:* THE CHAIR

This meeting will be webcast live at [www.milwaukee.gov/channel25](http://www.milwaukee.gov/channel25).

In the event that Common Council members who are not members of this committee attend this meeting, this meeting may also simultaneously constitute a meeting of the Common Council or any of the following committees: Community and Economic Development, Finance and Personnel, Judiciary and Legislation, Licenses, Public Safety and Health, Public Works, Zoning, Neighborhoods & Development, and/or Steering and Rules. Whether a simultaneous meeting is occurring depends on whether the presence of one or more of the Common Council member results in a quorum of the Common Council or any of the above committees, and, if there is a quorum of another committee, whether any agenda items listed above involve matters within that committee's realm of authority. In the event that a simultaneous meeting is occurring, no action other than information gathering will be taken at the simultaneous meeting.

Times for specific agenda items are estimations. If items cannot be heard at their specified times, they will be heard as soon as practicable thereafter.

Upon reasonable notice, efforts will be made to accommodate the needs of persons with disabilities through sign language interpreters or auxiliary aids. For assistance contact the Legislative Services ADA Coordinator at 286-2998, (FAX)286-3456, (TDD)286-2025 or by writing to Room 205, City Hall, 200 E. Wells Street, Milwaukee, WI 53202.

City Hall and the Zeidler Municipal Building are accessible by "The Hop" City Hall Stations, the MCTS Green Line, Gold Line, 14, 15, 19, 30, 33, and 57 bus routes. Visit <https://www.ridemcts.com/> for more information.

Bike racks are available on Water Street, Market Street, and Broadway, and a Rubix Bike Share station is located on the northeast corner of Kilbourn Avenue and Water Street.

Limited parking for persons attending meetings is available at reduced rates (5 hour limit) at the Milwaukee Center on the southwest corner of Kilbourn Avenue and Water Street. Parking tickets must be validated in the first floor Information Booth in City Hall.

Persons engaged in lobbying as defined in s. 305-43-4 of the Milwaukee Code are required to register with the City Clerk's License Division. Lobbyists appearing before a Common Council committee are required to identify themselves as such. More information is available at <http://city.milwaukee.gov/Lobbying>.

## APPENDIX

**Citizen Participation Plan**

**Public Hearing Notices & Advertisements**

**2019 Allocations: Administration & Community Housing  
Development Organization**

**Response to *Analysis of Impediments Study***

**Affirmative Marketing Plan**

**Resale and Recapture Policy**

# City of Milwaukee: Citizen Participation Plan

## **COMMUNITY DEVELOPMENT GRANTS ADMINISTRATION**

### **CITIZEN PARTICIPATION PROCESS FOR THE USE OF FEDERAL FUNDS**

#### **Citizen Participation 91.200 (b)**

**Lead Agency:** The agency responsible for oversight and monitoring of these Federal funds and ensuring that these activities are implemented is the Community Development Grants Administration. The oversight body for CDGA is the City of Milwaukee Community and Economic Development Committee (CED) of the Milwaukee Common Council. All actions taken by the Committee are ratified by the Milwaukee Common Council and the Mayor. CDGA annually solicits and evaluates applications from all interested parties through an open and competitive Request For Proposal (RFP) process. The funding categories for the RFP process receive input from the community at large and are finalized by the CED Committee and Mayor. Recommendations for annual funding are made to the Community and Economic Development Committee for approval with final ratification by the Milwaukee Common Council and Mayor.

In accordance with the regulations of the U.S. Department of Housing and Urban Development and in an effort to ensure adequate and accessible citizen participation, the City of Milwaukee adopted a Citizen Participation Plan, which was reviewed and approved by the Common Council of the City of Milwaukee on April 23, 1991. This plan outlines the procedures and processes used by the City to solicit citizen input and has been submitted to and approved by the U.S. Department of Housing and Urban Development.

The City's Citizen Participation Plan requires public hearings to obtain citizen input on funding proposals and inquiries at all stages of the community development program, including the Consolidated Plan and Annual Funding Allocation Plan (FAP) and review of proposed activities and program performance. The FAP is meant to define the City's community development needs and funding priorities as it relates to the use of Federal funds. Essentially the FAP is the basis for the Request for Proposal process. The FAP is reviewed annually through public hearings and amended where appropriate, as needs within the community change. Broad-based citizen and community input by stakeholders is strongly encouraged and solicited.

Over the years, the City of Milwaukee has used its Federal entitlement funds to creatively respond to community needs and to enable neighborhood residents, businesses and other community stakeholders to achieve the highest possible quality of life. Community-based organizations are essential to these goals for responding to community needs and for strengthening the social and economic infrastructure of Milwaukee's neighborhoods and their efforts are also coordinated with City agencies which have the same mission.

Relative to the allocation of funds, the City of Milwaukee places the highest priority on those programs which directly serve low and moderate income persons (defined as those with incomes of 80% or less of Milwaukee's median income). Priority is also given to those projects which serve residents of the Neighborhood Revitalization Strategy Areas (NRSAs), of which at least 70% of all residents are considered low income.

#### **City's Notification Requirement Regarding Draft Plan Availability**

A notification will be advertised in local newspapers of general circulation to inform the public that a draft Consolidated Plan, or draft Annual Action Plan is available to review and subject to public comment. The notification will describe the contents and purpose of the particular plan. The notice will also be posted on the City's website <http://city.milwaukee.gov/CDGA>.

The public notice will state that copies of the particular Plan may be available for review in various formats such as: City's website, City libraries, the City's Legislative Bureau and the offices of CDGA. Hard copies will also be available upon request.

The City will make the Plan(s) public, and upon request in a format accessible to persons with disabilities. The City will provide citizens a reasonable opportunity to comment on the Plan, and on any amendments to the Plan as defined by this Citizen Participation Plan. The City will consider any comments or views of citizens received in writing, or orally, at any of the public hearings, or during the 30-day public review and will address those comments in the Plan.

In preparation of the final Consolidated Plan, or Annual Action Plan, the City will include any written or oral comments on the plans in the final submission to HUD.

#### **Criteria for Substantial Amendments to the Consolidated Plan and Annual Action Plan**

The City of Milwaukee shall prepare a substantial amendment to its Consolidated Plan and/or Annual Action Plan(s) plan using the following criteria:

- 1) Whenever eligible activity categories proposed for funding are not listed in the City's current Consolidated Plan or Annual Action Plan;
- 2) Whenever there is a change in the purpose, scope, location or beneficiaries of an activity.

If there are amendments to the Consolidated Plan and/or Annual Action Plan(s), the City of Milwaukee will solicit citizen participation, including public hearings, in conformance with its Citizen Participation Plan.

#### **Performance Reports**

Further citizen involvement may be affected by the provision of Accomplishment Reports that identify the annual goals of each program funded and the status of the activities annually. This allows concerned citizens and other stakeholders the opportunity to determine if program operators working in their planning areas are delivering the services as funded.

As required by HUD, a Consolidated Annual Performance and Evaluation Report (CAPER) will be submitted to HUD by March 31<sup>st</sup> following the end of each program year which ends on December 31<sup>st</sup>. The CAPER provides an actual account of activities, accomplishments and expenditures, which occurred during the previous program year.

The City will publish a notice in local newspapers regarding the availability of the CAPER, which will

begin the 30-day review and comment period. The notice and the draft CAPER may also be made available to the public via the City's website, City libraries, Legislative Reference Bureau, CDGA offices and to interested persons who request a copy of the report.

Upon completion of the CAPER and prior to its submission to HUD, the City will make the report available to the general public for a (30) day review and comment period. Any comments received from the general public will be included in Final CAPER submitted to HUD.

The Community & Economic Development Committee will hold a hearing on the CAPER. Each public hearing notice will include the availability of an Interpreter if requested by non-English speaking or hearing-impaired persons that expected to participate at the hearing.

#### **Citizen Complaints**

CDGA has an internal system for responding to citizen complaints and concerns in a timely manner (generally, within 15 working days where practicable). Program Officers are available to meet with clients that present themselves at the CDGA offices. A written report is formulated when the issues are of a substantive nature and resolution is not achieved during the initial meeting.

Staff will follow-up on substantive issues and provide written responses to the complainant and if necessary, provide copies of these responses to the affected organizations. Staff will track the ensuing process and analyze feedback from the parties concerned to determine viable resolution.

#### **Access to Information for Limited & Non-English Speaking Persons**

To ensure access to information for all residents, current CDGA staff includes two bilingual persons (English-Spanish) who make themselves available in-house or at public hearings where some large segments of the population speak only Spanish. With our large Asian-American population, CDGA has access to Hmong-Laotian interpreters through its linkage with the Hmong American Friendship Association (HAFA).

Finally, several funded agencies have attained status as a Community-Based Development Organization (CBDO). The CBDO designation mandates that Boards of Directors of these organizations consist of not only citizens of the target area, but area business owners and other stakeholders, such as schools and churches. That directive broadens diverse community input and is in keeping with CDGA's philosophy of increasing resident participation in development of neighborhood strategies and all planning processes.



# City of Milwaukee: Public Hearing Notices & Advertisement

**PUBLIC HEARINGS  
CITY OF MILWAUKEE**

**COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM  
PROPOSED YEAR 2019 FUNDING ALLOCATION PLAN**

The City of Milwaukee - Community Development Grants Administration (CDGA) is soliciting public comments on proposed funding categories for the Year 2019 Community Development Funding Allocation Plan (FAP). The FAP incorporates strategic direction for the following grants: Community Development Block Grant, HOME Investment Partnerships, Emergency Solutions Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA).

The Funding Allocation Plan will be available to the public beginning Saturday, June 30, 2018 and can be picked up at the CDGA office located in Room 606, City Hall, 200 E. Wells Street or accessed on the website at [www.city.milwaukee.gov/CommunityDevelopment310.htm](http://www.city.milwaukee.gov/CommunityDevelopment310.htm)

Written comments on the 2019 Funding Allocation Plan can be submitted during the public comment period of June 30, 2018 to July 31, 2018 to: Mr. Steven L. Mahan; Director, Community Development Grants Administration; City Hall - 200 E. Wells Street, Room 606; Milwaukee, WI. 53202

In addition, the City of Milwaukee - Community and Economic Development Committee will hold the following public hearings to obtain citizen comments on the proposed funding categories for the Year 2019 Community Development Funding Allocation Plan (FAP).

**Monday, July 16, 2018**  
**Milwaukee Asian Market (Conference Center)**  
**6300 N. 78<sup>th</sup> Street**  
**Milwaukee, WI 53218**  
**6:00pm - 8:00 pm**

**Tuesday, July 17, 2018**  
**Mitchell Street Library**  
**906 Historic Mitchell Street**  
**Milwaukee, WI 53204**  
**6:00pm - 8:00 pm**

The Community & Economic Development Committee will meet on **Wednesday, July 18, 2018 at 1:30 pm at City Hall - Room 301-B** to adopt the 2019 Funding Allocation Plan.

**PLEASE NOTE:** Upon reasonable notice, efforts will be made to accommodate the needs of disabled individuals through sign language interpreters or other auxiliary aids. For additional information or to request this service, contact the Council Services Division ADA Coordinator at 286-2231, (FAX) 286-3456, (TDD) 286-2025, or by writing to the Coordinator at City Hall, 200 East Wells Street, Room 205 Milwaukee, WI 53202.



AFFIDAVIT OF PUBLICATION

0004801887

CITY OF MILWAUKEE  
200 EAST WELLS STREET ROOM  
CITY HALL ROOM 606

Milwaukee, WI 53202

I hereby state that I am authorized by Journal Media Group to certify on behalf of Journal Sentinel Inc., publisher of the Milwaukee Journal Sentinel and The Sunday Journal Sentinel, public newspapers of general circulation, printed and published in the city and county of Milwaukee; published in the Daily Edition of the Milwaukee Journal Sentinel on 8/3/2018; that the Milwaukee Journal Sentinel and The Sunday Journal Sentinel are newspapers printed in the English language and that said printed copy was taken from said printed newspaper(s).

*Nazma J*  
Legal Clerk

8/12/2018

Date Signed

State of Wisconsin

County of Brown

Signed and sworn before me

*Vicky Felty*

Notary Public State of Wisconsin, County of Brown

My Commission Expires 9/19/21



PC No.

**CITY OF MILWAUKEE  
COMMUNITY DEVELOPMENT  
BLOCK GRANT PROGRAM  
REQUEST FOR PROPOSALS  
- YEAR 2019 -**

The City of Milwaukee Community Development Block Grant (CDBG) Administration (CDBGA), is requesting proposals for the provision of community development and/or low-income housing assistance to the City of Milwaukee CDBG Target Area, located within the City's boundaries. Services include: Homeless Shelter Services, Homeless Development, Planning, Community Building, Affordable Housing, Homelessness, and Housing Opportunities for Persons with AIDS (HOPWA) - covers the City's Fair Housing Metropolitan Area.

Eligible applicants must be located in the City of Milwaukee and be registered as a business and/or non-profit entity at the time of application.

A hard copy of the RFP application packet will be available on the Community Development Grants Administration Office on August 3, 2018 and will also be accessible on the City's website. In addition, copies will be available for viewing at the following Milwaukee Public Libraries: Allen Library, 314 W. Wisconsin Ave.; Cedar-Cosmo, 1400 N. Fair St.; Century, 2227 W. Fond du Lac Ave.; Mitchell Street, 938 W. Wisconsin Ave.; and the Central Library, 222 W. Wisconsin Ave.

Completed proposals must be received by the Community Development Grants Administration Office by the date and time listed below:

**Final deadline for proposals and applications: August 21, 2018, 2:00 p.m.**

**Proposals received after this date and time will not be considered.**

**For more information contact:**  
**Community Development Grants Administration**  
**City Hall - 200 E. Wells Street**  
**Room 808 - 2nd Floor**  
**Milwaukee, WI 53202**  
**Telephone: (414) 226-3647**  
**TDD: (414) 226-0847**  
**8:00 a.m. - 4:45 p.m.**  
**Monday through Friday**  
**File August 3, 2018 10:00 a.m.**

**City of Milwaukee: 2019  
Funding Allocation –  
Administration & Community  
Housing Development  
Organization**

**2019 SUMMARY OF CONSOLIDATED PLAN BY PROJECT**  
**Entitlement Award - Year 5 of Consolidated Plan**

<u>IDIS #</u>		<u>CDBG</u>	<u>HOME</u>	<u>ESG</u>	<u>HOPWA</u>	<u>TOTAL</u>	<u>IDIS</u>
<b>1</b>	<b>NRSA Area #1</b>						<b>Project #1</b>
	Housing	1,014,500	2,008,825			3,023,325	1 of 5
	Economic Development	570,000				570,000	2 of 5
	Neighborhood Strategic Planning (NSP 1-14)	658,000				658,000	3 of 5
	Public Service - General	1,701,291				1,701,291	4 of 5
	Public Service - Youth Services	855,000				855,000	5 of 5
		<u>4,798,791</u>	<u>2,008,825</u>			<u>6,807,616</u>	
<b>2</b>	<b>NRSA Area #2</b>						<b>Project #2</b>
	Housing	257,500	1,407,500			1,665,000	1 of 5
	Economic Development	40,000				40,000	2 of 5
	Neighborhood Strategic Planning (NSP 15-17)	141,000				141,000	3 of 5
	Public Service - General	408,790				408,790	4 of 5
	Public Service - Youth Services	150,000				150,000	5 of 5
		<u>997,290</u>	<u>1,407,500</u>			<u>2,404,790</u>	
	sub-total (NRSA #1 - NRSA #2)	5,796,081	3,416,325			9,212,406	
<b>3</b>	<b>Citywide</b>						<b>Project #3</b>
	Housing	2,875,007	1,623,622			4,498,629	1 of 9
	Economic Development	366,500				366,500	2 of 9
	Neighborhood Strategic Planning (NSP 18-19)	94,000				94,000	3 of 9
	Public Service - General	480,000				480,000	4 of 9
	Public Service - Youth Services	338,000				338,000	5 of 9
	Planning	110,000				110,000	6 of 9
	Clearance & Demolition	0				0	7 of 9
	CDBG Non-Profit Organization Capacity Building	200,000				200,000	8 of 9
	Public Infrastructure	300,000				300,000	9 of 9
		<u>4,761,507</u>	<u>1,623,622</u>			<u>6,385,129</u>	
<b>4</b>	<b>Administration (Contingency \$71,468)</b>	1,709,488	340,000			2,049,488	Project #4
<b>5</b>	<b>Fair Housing</b>	200,000				200,000	Project #5
<b>6</b>	<b>Accessible Rehab</b>	42,750				42,750	Project #6
<b>7</b>	<b>Code Enforcement</b>	1,984,162				1,984,162	Project #7
<b>8</b>	<b>Shelter/Domestic Abuse</b>	1,300,000				1,300,000	Project #8
<b>9</b>	<b>Vacant/Blighted Real Estate</b>	0				0	Project #9
<b>10</b>	<b>HOPWA - AIDS Resource Center</b>				640,335	640,335	Project #10
<b>11</b>	<b>HOPWA - Richard's Place</b>				213,320	213,320	Project #11
<b>12</b>	<b>HOPWA - Community Dev Grants Admin</b>				15,000	15,000	Project #12
<b>13</b>	<b>ESG18 Milwaukee</b>			1,343,635		1,343,635	Project #13
		<u>16,793,966</u>	<u>5,379,947</u>	<u>1,343,635</u>	<u>866,655</u>	<u>23,386,203</u>	

**YEAR 2019 ADMINISTRATION/PLANNING ALLOCATIONS**  
Entitlement Funds

NRSA Area	Organization Name	Funding Category	CDBG 2019	HOME 2019	ESG 2019	HOPWA 2019	TOTAL
<b>Administration</b>							
103	Community Development Grants Administration	Administration	920,000	285,000	50,000	15,000	1,270,000
103	Comptroller's Office	Administration	500,000	66,000			566,000
	Department of City Development	Administration	190,000				190,000
	RACM	Environmental Planning and Review	28,000				28,000
			1,638,000	340,000	50,000	15,000	2,043,000
<b>Planning</b>							
	Community Development Grants Administration	Continuum of Care Planning	30,000				30,000
	Department of Administration	Equal Rights Commission	80,000				80,000
	Legal Action of Wisconsin	Fair Hag Enforcement/Public Educ & Eviction Prevention	60,000				60,000
104	Metro Milwaukee Fair Housing Council	Fair Hag Enforcement/Public Educ & Predatory Lending Prog	100,000				100,000
	Metro Milwaukee Mediation Services, Inc.	Fair Hag Enforcement/Public Educ & Eviction Prevention	40,000				40,000
	Urban Economic Development Association of WI	Fair Hag Enforcement/Public Educ & Eviction Prevention	10,000				10,000
			310,000				310,000
		<b>Total Planning &amp; Admin</b>	1,948,000	340,000	50,000	15,000	2,353,000
			12.3%	6.3%	3.7%	1.7%	

Annual Plan-2019-Admin-Admin-Plan

**YEAR 2019 ALLOCATIONS: CHDO**

NRSA AREA	ORGANIZATION NAME	CATEGORY & DESCRIPTION	CHDO 2019	HOME 2019	TOTAL
	<b>CHDO</b>				
2	CHDO Poo.	Affordable Housing (Acquire/Rehab/Sell & New Construction)-CHDO	350,000	350,000	350,000
2	Layton Boulevard West Neighbors, Inc.	Affordable Housing (Acquire/Rehab/Sell & New Construction)-CHDO	200,000	200,000	200,000
2	Milwaukee Christian Center-NIP	Affordable Housing (Acquire/Rehab/Sell & New Construction)-CHDO	300,000	300,000	300,000
			<b>850,000</b>	<b>850,000</b>	<b>850,000</b>
		<b>CHDO %</b>	<b>15.3%</b>		
	<b>CHDO Operating Costs</b>				
2	Layton Boulevard West Neighbors, Inc.	CHDO Operating HOME Funds	95,000	95,000	95,000
1	Legacy Redevelopment Corp	CHDO Operating HOME Funds	75,000	75,000	75,000
2	Milwaukee Christian Center-NIP	CHDO Operating HOME Funds	100,000	100,000	100,000
			<b>270,000</b>	<b>270,000</b>	<b>270,000</b>
		<b>CHDO Operating %</b>	<b>6.0%</b>		



# City of Milwaukee: Response to Recommendations from the City's Analysis of Impediments Study

## Analysis of Impediments

**Affirmatively Furthering Fair Housing** - Provide a summary of impediments to fair housing choice.

The Community Development Grants Administration completed a Fair Housing Impediments Study in 2005, in accordance with Sections 104(b) (2) and 106(d)(5) of the Housing and Community Development Act of 1974, as amended which requires that CDBG grantees certify that they will affirmatively further fair housing. The public comment period on the study was September 28, 2005 to October 28, 2005. There were no comments submitted to CDGA on the study. The City's Community & Economic Development Committee, which is the oversight body for the use of Federal funds, held a public hearing on the study on November 29, 2005. Representatives of the Metro Milwaukee Fair Housing Council led a detailed discussion on the major components of the study. Committee members stated their intentions to initiate a task force to work on implementing certain recommendations outlined in the study. The City and Milwaukee County have put out a request for an updated impediments study that will encompass both the City and Milwaukee County.

The following is a summary of impediments identified in the last Fair Housing Impediments Study:

- Institutional and governmental policies and regulations which affect income and housing
- Non-coherent Federal housing mandates and Federal and State transportation policies
- Lack of enforcement mechanism for complaints of discrimination
- Lack of housing units accessible to persons with disabilities
- Overcrowded housing
- Lack of affordable housing supply
- Cuts in funding to Section 8 Housing Choice Voucher Program
- Lack of a Regional Housing Strategy or Plan
- Attack on the Community Reinvestment Act (CRA)
- Suburban policies (NIMBYism, impact fees, exclusionary zoning codes, exclusionary public housing or Section 8 Rent Assistance vouchers, inadequate public transportation).
- Social class, racial and cultural barriers
- Housing and employment discrimination
- Residential segregation
- Inadequate income
- Racial disparities in mortgage lending
- Insurance redlining; appraisal practices
- Racial steering

## **Analysis of Impediments**

### **Identify actions taken to overcome effects of impediments identified in the Jurisdiction's Analysis of Impediments.**

The City of Milwaukee funds multiple housing and other programs designed to affirmatively market Milwaukee neighborhoods and reduce barriers to affordable housing. These programs support the administration and enforcement of federal, state and local fair housing ordinances, provide homebuyer counseling services and collaboratively work with financial lenders to enable low and moderate-income families to purchase homes anywhere they choose. Viewed holistically, these programs accomplish several purposes at once: they affirmatively promote neighborhoods; enforce and further fair housing; expand on housing opportunities available to minorities and the poor within and outside of areas of minority concentration and help to strengthen neighborhoods by increasing homeownership and eliminating blight.

#### **Fair Housing Ordinance**

The City passed its first fair housing ordinance on December 12, 1967. In line with Wisconsin State Statutes enacted in 1965, the ordinance rendered unlawful any type of discrimination in the sale, rental or lease of housing based on race, color, religion, national origin or ancestry. Expressly prohibited were the following forms of discrimination: (1) Refusal to sell, lease, finance or contract to construct housing or to discuss the terms thereof; (2) Refusal to permit inspection or exacting different or more stringent price, terms or conditions related to the sale, lease or rental of housing (3) Refusal to finance or sell an unimproved lot or to construct a home or residence on a lot; or (4) Publishing, circulating, issuing, displaying or advertising the sale, financing, lease or rental of housing which states or indicates any discrimination in connection with housing.

The City's original fair housing ordinance was repealed and recreated on October 16, 1990, and again on December 16, 2008. Referred to as Chapter 109, it was subsequently amended to prohibit both housing and employment discrimination. Regarding housing, the law applies to all housing units intended for occupancy by two or more families living independently of each other, eliminates provisions against testing, and substantially increases penalties for non-compliance. The City subcontracted with the Metro Milwaukee Fair Housing Council and Legal Aid Society to handle complaints that are in violation of the City's ordinance and other federal and state laws.

#### **City of Milwaukee – Equal Rights Commission**

In 2009, the City re-established its Equal Rights Commission. The Milwaukee Common Council approved legislation on December 16, 2008 recommending a new ERC model. Commissioners for the ERC were confirmed in January 2009.

The City of Milwaukee ERC was established by ordinance with the broad objective of providing oversight and establishing collaborative working relationships with other organizations in Milwaukee, academia, and the business community to improve the equal rights climate in the City of Milwaukee. The goals are to maintain the City's oversight, investigative and enforcement capabilities over discriminatory practices not addressed and protected by federal and state laws. The following are the broad functional responsibilities of the new ERC:

## **Analysis of Impediments**

### **Oversight/Accountability/Community Collaboration and Partnerships/Prevention, Education, and Training**

The Equal Rights Commission has been fully operational since February 2009 when the first meeting was held. The Commission is charged with monitoring the employment, contracting, and program activities of the City, preparing and providing timely reports to the Mayor and Common Council on efforts to promote equal rights, equal opportunities, positive community relations, and to eliminate discrimination and inequities in City government and the City.

In order to help accomplish its mission, the Commission formed three Sub-Committees: the *Accountability Structure Sub-Committee*, the *Community Engagement Sub-Committee*, and the *Paid Sick Leave Ordinance (PSLO) Sub-Committee*.

Throughout 2014, the Commission held briefings with City departments to further understand department efforts in relation to equal rights issues. In addition, representatives from the Metro Milwaukee Fair Housing Council (MMFHC) presented an overview of their work and expressed continued interest in working with the Commission to streamline the referral process for housing discrimination complaints.

CDGA has begun a new Community Outreach mechanism to assist the ERC in educating the community on human/civil rights and civil liberties and on resources and options available to assist with discrimination complaints. Community collaborations and partnerships will be enhanced to promote and support Prevention, Education and Training in the areas of Housing and Lending Discrimination.

Specifically, in conjunction with the mission of the *Community & Neighborhood Engagement Sub-Committee* of the Equal Rights Commission, ERC staff and the MMFHC will train community organizers in each of the 18 planning areas on the equal rights objectives of City Chapter 109 and Section 104(b)(2) and Section 106(d)(5) of the Housing & Community Development Act of 1974.

At the conclusion of training, each MSP community organizer will engage in the following: conducting community surveys, referrals of discrimination complaints, distribution of resource materials and coordination of fair housing presentations with assistance from MMFHC.

#### **TITLE II of the Americans with Disabilities Act of 1990(ADA)**

Title II of the ADA prohibits discrimination against persons with disabilities in all services, programs and activities made available by State and local governments. CDGA included this language in all contracts with funded organizations.

#### **Section 504 of the Rehabilitation Act of 1973**

Section 504 prohibits discrimination against persons with disabilities and requires that a percentage of funded projects be handicapped accessible. CDGA routinely reviewed plans for multi-family housing and facilities where CDBG funded services are provided to ensure accessibility and participation by disabled persons.

## **Analysis of Impediments**

### **SECTION 8 – Rent Assistance Program**

The Housing Authority of the City of Milwaukee (HACM) receives funds from HUD to operate its Rent Assistance Program (RAP). RAP pays rental subsidies to private landlords who rent to very low - income tenants in the program. Under the Housing Voucher Choice Program, units cannot exceed HUD's fair market rents, meaning that rents must be determined reasonable in relation to other units in the area. In the voucher program, tenants are able to rent units which have rents from 10% to 20% above fair market value when they locate to a "non-impacted" area --- where fewer than 40% of the families are below the poverty level.

HACM also participated in a program which markets the benefits of living in non-traditional residential areas and encouraged more rent assistance clients to move to such areas. This was accomplished through: orientation briefings to explain fair housing law, client location options and additional services; general counseling to families regarding housing choices and housing search skills; direct tenant referrals to available units in non-traditional areas resulting in the pro-integrative placement of families; and, the recruitment of new owners of units in non-traditional areas. During orientation and counseling, all RAP applicants were informed that they could seek housing anywhere they chose and were also informed of the portability provisions of vouchers and the advantages of locating to a non-traditional area. Listings of housing units were provided to applicants, including many in non-traditional areas. Also, a list of wheelchair accessible units was made available upon request for those in need.

In addition, the City continued its commitment to city-wide fair housing programs to help ensure accountability in lending by government-chartered lending institutions in the areas of: home purchase, home improvement and business loans, employment and promotional opportunities and contracting opportunities for minority and women-owned businesses.

### **Community Organizing to Strengthen Milwaukee Neighborhoods**

Community organizing is recognized as an important component in strengthening Milwaukee neighborhoods through resident action on crime prevention and housing blight. In 2019, \$893,000 in CDBG funds was awarded to neighborhood organizations to undertake activities to make Milwaukee neighborhoods safer, cleaner and more attractive, which is essential to any effort to affirmatively promote fair housing choice. More than 8,000 residents are expected to be directly involved in these activities.

**Independence First** - continues to provide referrals to accessible housing in and around the Metropolitan Area.

### **Homebuyer Counseling & Other Homebuyer Assistance Activities**

A total of \$325,000 was allocated for homebuyer counseling, post purchase education and other homebuyer assistance activities which are expected to result in over 1,000 persons assisted. Besides pre-purchase counseling and mortgage loan assistance, funded agencies provided budget counseling and assistance with credit repair.

The counseling agencies met regularly to maintain a collaborative working relationship with one another. They addressed issues related to affordable home ownership resulting in the following

### Analysis of Impediments

system improvements to better serve prospective clients; utilization of a standardized data base, standardized employee qualifications and job descriptions, on-going training for home buyer counselors and the establishment of community outstations to improve access to homebuyer assistance services. Homebuyer counseling services have expanded to include assistance to residents in obtaining home improvement/repair loans, refinancing of existing mortgage loans, post purchase, tax default and mortgage default counseling.

These efforts all play a major role in affirmatively furthering fair housing and have helped result in the following accomplishments:

- Increased owner occupancy in areas previously neglected and ignored by lenders;
- Promotion of neighborhood stability and pride; Increased City tax base;
- Promotion of the Central City as a desirable place to live and work;
- Education and training programs for lenders to help eliminate stereotypes that create barriers for prospective homeowners;
- Improved communication between community agencies and lenders;
- Increased access to mortgage and other lending by persons previously denied, namely persons of color.

#### 2019 Block Grant Awards used to Reduce Housing Impediments

CDBG Funded –Activity	2019 Allocation
Community Organizing/Crime Prevention/NSP	\$893,000
Home Buying Counseling Program	\$325,000
Fair Housing	\$200,000
Equal Rights Commission	\$80,000
<b>TOTAL</b>	<b>\$1,498,000</b>

## Analysis of Impediments

### Recommendations from the City of Milwaukee: *Analysis of Impediments to Fair Housing Study*

#### **1) Facilitate the Production of Affordable Housing**

The City of Milwaukee funds multiple housing and other programs designed to affirmatively market Milwaukee neighborhoods and reduce barriers to affordable housing. These programs support the administration and enforcement of federal, state and local fair housing ordinances, provide homebuyer counseling services and collaboratively work with financial lenders to enable low and moderate-income families to purchase homes anywhere they choose. Viewed holistically, these programs accomplish several purposes at once: they affirmatively promote neighborhoods; enforce and further fair housing; expand on housing opportunities available to minorities and the poor within and outside of areas of minority concentration and help to strengthen neighborhoods by increasing homeownership and eliminating blight.

The City of Milwaukee operates a combination of residential rehabilitation programs, public housing, homeownership and fair housing initiatives, each designed to foster and maintain affordable housing and provide opportunities for low income citizens to access affordable housing. All of the programs listed hereafter in this section provide outcomes that are consistent with the goals articulated in the Consolidated Plan. The Plan indicated that efforts will be made to increase homeownership opportunities and to improve the condition of the City's rental housing stock.

*The largest effort is public housing operated by the Housing Authority of the City of Milwaukee (HACM) which manages several thousand housing units. With the units HACM owns and maintains and the Section 8 Rental Assistance program it administers, a large segment of Milwaukee's very low income population is provided with affordable housing. In conjunction with those efforts, programs operated by funded community-based agencies encourage the maintenance and upkeep of affordable housing.*

**Acquire/ Rehab/ Sell/New Home Construction** - CDBG/HOME funds are allocated for this program which acquires, rehabilitates and sells houses to low income families as part of a comprehensive and targeted neighborhood initiative. Distressed properties that were slated for demolition are rehabilitated for income eligible homebuyers. Working with non-profit CDBG and HOME-funded groups, the City allowed these operators first priority at selected, tax-foreclosed properties for a nominal cost, generally not exceeding \$1000. Properties renovated by funded non-profits were made available to low to moderate income buyers at the after rehab market value of the property. With the City absorbing the gap between the after rehab appraisal and the cost of development, renovated properties were made available and affordable for income eligible persons.

#### **Neighborhood Improvement Programs (NIPs)**

CDGA and the Department of Neighborhood Services partner with community organizations to operate Neighborhood Improvement Programs (NIPs). These programs provide direct housing rehab services to abate building code violations for very low and extremely low-income owner occupants in the CDBG target area.



## Analysis of Impediments

### Department of City Development

The City's Department of City Development (DCD) works to improve the quality of life in City neighborhoods by promoting affordable housing, increased homeownership and neighborhood stability. Working with a broad range of partners including other City Departments, community-based agencies, financial institutions, residents, developers, and the local philanthropic community, DCD provides resources to upgrade Milwaukee's housing stock and improve the quality of life for City residents.

DCD's **Owner-Occupied Home Rehab Initiative** utilizes CDBG/HOME funds to finance home rehabilitation for owner occupants (one to four units) meeting established income guidelines. The program supplements activities with funding from Tax Incremental Districts (TID) and local foundations.

DCD's **Rental Rehabilitation Program** utilizes HOME funds to assist responsible landlords in providing safe, decent and affordable housing for income-qualified tenants. Based on the amount of HOME funds received, landlords must reserve a certain number of units for low and moderate income tenants for an extended period of time; generally five to ten years after the renovations are completed.

**Habitat for Humanity:** The City of Milwaukee continues its relationship with the Milwaukee chapter of Habitat for Humanity to offset the cost of constructing new single-family homes for very low-income households. These new homes help breathe new life into some of the most deteriorated neighborhoods in the City of Milwaukee.

**Homebuyer Assistance Program:** This program provides Homebuyer Assistance to increase the homeownership rate among low income and minority households by providing down payment, closing costs and rehabilitation assistance to eligible first-time homebuyers with incomes below 80% of the area median income.

### SECTION 8 – Rent Assistance Program

The Housing Authority of the City of Milwaukee (HACM) receives funds from HUD to operate its Rent Assistance Program (RAP). RAP pays rental subsidies to private landlords who rent to very low income tenants in the program. Under the Housing Voucher Choice Program, units cannot exceed HUD's fair market rents, meaning that rents must be determined reasonable in relation to other units in the area.

### **Fund an Affordable Housing Production Task Force**

The City should establish and fund an Affordable Housing Production Task Force. This task force, comprised of private and not-for-profit housing experts, would be charged with identifying and securing federal and private funds to help subsidize the development of low-income and affordable housing.

**Status:** During 2006, the Common Council and Mayor of the City of Milwaukee voted to provide \$2.5 million in bonding to capitalize a Housing Trust Fund in 2007. The purpose of the Housing Trust Fund is to support developers and governmental entities in the acquisition, construction, rehabilitation and



## **Analysis of Impediments**

modification of affordable and accessible housing for low-income households and to finance support services that assist low income households in obtaining and maintaining affordable housing. Ongoing revenue from the City budget continues to be one source of funding. Additional revenue sources to maintain the Trust Fund include revenue from: a) Potawatomi gaming proceeds; b) Tax Incremental Financing (TIF) expansion dollars, and; c) Designated PILOT funds.

In addition, the City participates as a member of the Supportive Housing Commission which includes local municipalities, area shelter providers, and other providers of housing for special needs populations.

The Neighborhood Improvement Development Corporation (NIDC) works with City departments, community-based agencies, financial institutions, developers, local foundations, and most importantly, residents, to increase the availability of affordable housing and to improve the condition of Milwaukee's existing housing stock.

### ***a. Utilize Tax Incremental Financing (TIF) to Produce Affordable Housing***

The City should be more assertive in its use of TIF to create more affordable housing units. TIF approval evaluation criteria could prioritize residential development projects that include affordable housing. Partnerships with local community development groups and affordable housing developers should be established to research more creative ways for the City to use TIF to produce affordable housing. TIF could be an effective tool to better meet Milwaukee's need for more affordable housing units.

**Status:** The City has funded several housing projects utilizing Tax Incremental Financing and has also created several Tax Incremental Districts specifically for affordable housing projects.

### ***b. Re-evaluate the City's Supply of Affordable Housing***

The City is in a difficult position in terms of its supply of affordable housing. Due to several factors such as urban disinvestment, demand, and suburban exclusionary policies, a majority of the region's affordable housing supply is disproportionately located in the City. This disparity in the location and provision of affordable housing means that households with lesser means and greater social service needs locate in the City of Milwaukee. The concentration of this population in the City not only causes a strain on the City's resources, but also creates a concentration of poverty in the central part of the region – the City. The City should reevaluate its supply of affordable housing and take steps to promote affordable housing within its own borders and advocate for affordable housing development within suburban areas.

**Status:** Ongoing evaluation and discussions with the Southeast Wisconsin Regional Planning Commission and housing producers which encompasses the City and County of Milwaukee and several other jurisdictions in Southeast Wisconsin. In addition, the City of Milwaukee has submitted its Smart Growth Plan in compliance with the State of Wisconsin requirements.

### ***c. Redefine "Affordable Housing"***

## **Analysis of Impediments**

Milwaukee should create a new definition of affordable housing using accurate and reliable indicators. Important issues to take into account should include: income of City of Milwaukee residents (as opposed to using the County Median Income), quality of housing units, and availability of housing. Using this new definition, the City should conduct an accurate assessment of its livable, affordable housing supply. In addition, a projection of the supply of affordable housing, given rent and property value increases over the next 10 years, should be completed.

**Status:** The City's definition of "affordable housing" and "low income household(s)" is consistent with Federal HUD regulations, as required by HUD.

### ***2) Advocate for Changes in State and Federal Programs to Expand Affordable Housing Options***

#### ***a. Additional Section 8 Housing Choice Vouchers***

The City of Milwaukee should facilitate a meeting with local HUD officials, as well as Wisconsin's U.S. Senators and Representatives, to discuss the adverse impact of recent HUD actions. Specifically, these discussions should emphasize the deleterious effects of the HUD budget cuts and administrative changes within the Section 8 Voucher Program on the City and its residents. The City of Milwaukee should advocate for additional Section 8 Vouchers or alternative means to meet the need of low-income residents.

**Status:** The Housing Authority of the City of Milwaukee (HACM) manages approximately 3,300 units of low-income housing that are subsidized by the U.S. Department of Housing and Urban Development and also administers 5,600 HUD Section 8 vouchers. HACM consistently solicits additional funding from a variety of sources for other affordable housing projects including: Section 32 Homeownership Program, Section 8(y) Homeownership option, CHOICE Neighborhood grants and Low Income Housing Tax Credits.

#### ***b. Advocate for Affordable Housing Production Resources***

The City of Milwaukee should facilitate a meeting with state and federal elected officials to advocate for additional financing resources to build affordable housing, particularly for extremely low income persons. The City should also research successful models of affordable housing production in other communities for possible replication in the City of Milwaukee.

**Status:** The City continuously advocates for additional resources for affordable housing projects. Besides Federal HUD funds, the City has committed millions of dollars per year and has been successful in obtaining other Federal, State and local resources for affordable housing initiatives and also established the Housing Trust Fund.

## **Analysis of Impediments**

### ***c. Advocate for Revisions to WHEDA's Low Income Housing Tax Credit (LIHTC) Program Allocation Scoring***

WHEDA's tool for scoring LIHTC applicants, the Qualified Allocation Plan (QAP), gives preference to development projects that have community support. As discussed in a previous section, this *community support* allows a municipality to oppose needed affordable housing.

The City of Milwaukee should advocate that WHEDA develop a scoring mechanism that (1) calculates the need for affordable housing based on the wages and salaries of the employment opportunities in that municipality and (2) eliminates the provisions by which developments receive additional scoring points awarded for community support of projects. For example, if a community has a large supply of expensive, unaffordable housing, yet a workforce with many low-paying retail jobs, points could be awarded based on the need in that community for housing which is affordable to those low wage earners.

**Status:** This is within the jurisdiction of the State of Wisconsin and not within the jurisdiction of the City of Milwaukee. The City does work with WHEDA by communicating our priorities for the type of projects needed in the City.

### ***d. Advocate for the Creation of an Improved Infrastructure between Medicare/Medicaid and Section 8***

According to a report by the Centers for Medicare and Medicaid a number of persons with disabilities in Milwaukee County desired to move out of nursing care facilities. Although they were physically able to do so, they lacked the financial resources to make such a transition. The City should meet with representatives of HUD and the Department of Health and Human Services to explore options that would allow those persons, desiring to do so, to move out of nursing care facilities and be integrated into the community.

**Status:** This lies within the jurisdiction of Milwaukee County government, the State of Wisconsin and the Federal government.

### ***e. Advocate for a Strengthened Smart Growth Law***

The City should continue to advocate for a strengthened Smart Growth Law. The State's Smart Growth Law contains a goal that all communities include in their required comprehensive plan, a plan for housing that includes housing for persons at all income levels and needs. If all communities in the four county region were to do this, Milwaukee would not have a disproportionate amount of the regions' affordable housing.

**Status:** The City has advocated for a stronger Smart Growth Law and has also submitted its Smart Growth Comprehensive Plan to the State of Wisconsin.

## **Analysis of Impediments**

### ***f. Advocate for a Regional Housing Strategy***

Many southeastern Wisconsin communities outside of Milwaukee are under pressure to find a new source of water and are looking at Lake Michigan as the solution. The City of Milwaukee, which has access to Lake Michigan, has a disproportionate share of the region's affordable housing and is looking at the rest of Southeastern Wisconsin to also address this issue. The City should leverage its Lake Michigan access to convince the rest of the region to provide greater housing cost diversity. The development of a *Regional Housing Strategy* could be incorporated into further water negotiations with western suburbs. Communities should plan for an adequate amount of housing to serve all income levels, particularly income levels represented by the salaries and wages of the employers in each community. SEWRPC would be the likely organization to complete such a study, however because of SEWRPC's historic focus on suburban issues, Milwaukee should play a primary role in this planning effort to ensure urban issues are properly addressed.

**Status:** The Southeast Wisconsin Regional Planning Commission which encompasses the City and County of Milwaukee and several other jurisdictions in Southeast Wisconsin adopted a Regional Housing Plan in March 2013. The plan has recommendations for residential development, including affordable housing for all income levels, age groups and special needs populations. In addition, the City's Housing Trust Fund has recommended expanding its activities to other municipalities within the Southeast region of Wisconsin.

### ***3) Encourage Landlord Participation in the Housing Choice Voucher Program***

The Housing Authority of the City of Milwaukee (HACM) staff should conduct a review of where current voucher holders are living. Areas that are underrepresented by voucher holders should be identified, and targeted for increased landlord recruitment.

**Status:** The Housing Authority currently works to increase landlord involvement in its programs and has also created scattered site housing to expand housing choice options for families.

### ***4) Recommendation #4: Facilitate the Production and Modification of Accessible Units***

#### ***a. Utilize Tax Incremental Financing (TIF) to Produce Accessible Housing***

The City should more assertively use TIF to create more accessible housing units for persons with disabilities. For instance, TIF approval evaluation criteria could prioritize residential development projects that include accessible housing. The City should partner with local Independent Living Centers and other disability rights advocacy groups to research more creative ways for the City to use TIF to produce affordable, accessible housing.

**Status:** The City has funded several housing projects utilizing Tax Incremental Financing, specifically for affordable housing projects, all of which have accessible housing units. In addition, projects funded with CDBG and HOME Entitlement funds, WHEDA tax credits and Housing Trust Fund dollars have accessible housing units.

## Analysis of Impediments

### **5) Re-establish Means to Enforce the City's Housing and Employment Discrimination Ordinance**

The City should re-establish the capacity to receive, investigate and adjudicate complaints of unlawful housing discrimination. This local enforcement component would complement the services provided by MMFHC and provide victims of discrimination a local source of remedy. The local ordinance outlines an enforcement process which is not currently being implemented or made available to persons wishing to file a complaint.

#### **Status: City of Milwaukee – Equal Rights Commission**

The City re-established its Equal Rights Commission (ERC), which was approved by the Milwaukee Common Council on December 16, 2008. The broad objectives of the ERC are to provide oversight and establish collaborative working relationships with other organizations in Milwaukee, academia, and the business community to improve the equal rights climate in the City of Milwaukee. The goals are to maintain the City's oversight, investigative and enforcement capabilities over discriminatory practices not addressed and protected by federal and state laws. The following are the broad functional responsibilities of the new ERC:

1. Oversight
2. Accountability
3. Community Collaboration and Partnerships Prevention
4. Education and Training

The Equal Rights Commission has been fully operational since 02/10/09 when the first meeting was held. The Commission is charged with monitoring the employment, contracting, and program activities of the City, preparing and providing timely reports to the Mayor and Common Council on efforts to promote equal rights, equal opportunities, positive community relations, and to eliminate discrimination and inequities in City government and the City.

In order to help accomplish its mission, the Commission formed three Sub-Committees: *The Accountability Structure Sub-Committee*; *the Community Engagement Sub-Committee*; and *the Paid Sick Leave Ordinance (PSLO) Sub-Committee*.

The Commission scheduled briefings with City departments to further understand department efforts in relation to equal rights issues. In addition, representatives from the Metro Milwaukee Fair Housing Council (MMFHC) presented an overview of their work and expressed continued interest in working with the Commission to streamline the referral process for housing discrimination complaints. The Commission was asked to review the Analysis of Impediments to Fair Housing Report to better understand how the City and MMFHC can work together on issues identified in the report. Training sessions were held in 2016 for City agencies regarding housing discrimination.

## **Analysis of Impediments**

The following learning objectives have been identified for the training:

1. Familiarize City of Milwaukee employees with the provisions of federal, state and local fair housing laws in order to provide better assistance to persons in Milwaukee who may experience illegal housing discrimination.
2. Discuss common forms of illegal discrimination in the housing market through recent case examples so that City of Milwaukee employees may be better able to discern possible violations and provide appropriate referrals for housing related issues.
3. Apprise City of Milwaukee employees of services available to victims of housing discrimination by MMFHC so that persons in Milwaukee may obtain investigative and legal assistance to pursue complaints.

### **6) Review and Amend the City of Milwaukee Housing and Employment Discrimination Ordinance**

The City of Milwaukee should thoroughly review and amend its Housing and Employment Discrimination Ordinance (Chapter 109 of the City of Milwaukee Ordinances) to ensure that it is consistent with existing state and/or federal fair housing laws. Particular attention should be devoted to providing remedies for victims of housing discrimination. Currently, the ordinance is explicit regarding civil forfeitures, but is vague about remedies that the victim of discrimination may recover. Absent these types of recoveries, there is little incentive for persons to file with the City, versus other public enforcement agencies whose laws include compensatory damages, injunctive relief and recovery of attorneys' fees.

**Status:** The City has revised and updated Chapter 109 of the Milwaukee Code of Ordinances which was approved by the Milwaukee Common Council in 2009.

### **7) Support of Comprehensive Fair Housing Services**

#### **a. Continued Support of Metropolitan Milwaukee Fair Housing Council**

The City should continue support of the Metropolitan Milwaukee Fair Housing Council, which provides comprehensive fair housing services in the areas of direct assistance to victims of housing discrimination, investigations of systemic forms of illegal discrimination, outreach and education throughout the community, anti-predatory lending activities, and community and economic development issues. As part of this partnership, the staff of the Common Council and appropriate city departments should be trained and familiarized with the services of MMFHC to facilitate referrals of fair housing and fair lending issues from local residents.

**Status:** The City provides funding on an annual basis to the *Metropolitan Milwaukee Fair Housing Council* and the Legal Aid Society. In addition, as stated above, a commitment was made to conduct training sessions for City agencies regarding housing discrimination.



## **Analysis of Impediments**

### ***b. Mobility Program***

The City should establish a program that provides assistance to persons desiring to make pro-integrative housing moves, either in the rental or sales markets. Assistance would take the form of counseling about non-traditional neighborhoods, neighborhood tours, community profiles to market City neighborhoods and financial incentives, such as down payment or security deposit assistance. This would also include a Mobility Assistance Program for Housing Choice Voucher Holders to help facilitate economic integration and residential desegregation.

**Status:** The Housing Authority (HACM) receives funds from HUD to operate its Section 8 Rent Assistance Program (RAP). RAP pays rental subsidies to private landlords who rent to very low-income tenants in the program. Under the Housing Voucher Choice Program, units cannot exceed HUD's fair market rents, meaning that rents must be determined reasonable in relation to other units in the area. In the voucher program, tenants are able to rent units which have rents from 10% to 20% above fair market value when they locate to a "non-impacted" area --- where fewer than 40% of the families are below the poverty level.

HACM also participates in a program which markets the benefits of living in non-traditional residential areas and encourages more rent assistance clients to move to such areas. This is accomplished through: orientation briefings to explain fair housing law, client location options and additional services; general counseling to families regarding housing choices and housing search skills; direct tenant referrals to available units in non-traditional areas resulting in the pro-integrative placement of families; and, the recruitment of new owners of units in non-traditional areas. During orientation and counseling, all RAP applicants are informed that they could seek housing anywhere they chose and were also informed of the portability provisions of vouchers and the advantages of locating to a non-traditional area. Listings of housing units are provided to applicants, including many in non-traditional areas. Also, a list of wheelchair accessible units is made available upon request for those in need.

In addition, CDBG-funded homebuyer counseling agencies regularly conduct neighborhood tours and also provide information on housing options in neighborhoods throughout the City of Milwaukee.

### ***Fund a Regional Equity Audit***

The City should fund a Regional Equity Audit. The racial and economic disparities that exist between City residents and residents of suburban communities are vast. The disparities encompass all aspects of quality of life, such as: education, housing and employment, as well as access to health care, transportation and other services. A variety of sources have documented these inequities in a variety of ways, but documenting only informs the public of the problem, it does nothing to solve or recommend solutions. The Regional Equity Audit would be a project to research and investigate procedural or policy actions undertaken by other communities that have the result of furthering or reinforcing suburban/City racial and economic segregation. Housing, education and transportation are the most notable quality of life aspects in which a community's exclusivity is a major reason for continued disparities.

## Analysis of Impediments

**Status:** This should be discussed and decided by the Southeast Wisconsin Regional Planning Commission.

### **8) Continue Support and Increase Participation in MMFHC's Anti-Predatory Lending Program**

The City of Milwaukee's support of MMFHC's anti-predatory lending program, Strategies To Overcome Predatory Practices (STOPP), is a critical component to combat illegal lending practices in the City of Milwaukee. This collaborative network of lenders, housing counseling agencies, community groups, Legal Aid Society and government representatives has successfully initiated measures to reduce these abusive loans in the City. It is therefore imperative for the City to continue its financial support and increase its direct participation in STOPP's efforts.

**Status:** The City provides funding on an annual basis to the Metro Milwaukee Fair Housing Council, Legal Action and the Legal Aid Society for their anti-predatory lending programs.

### **9) Support Consumer Rescue Fund for Victims of Predatory Lending**

The City of Milwaukee should use its relationships with responsible area lenders, urging them to work with MMFHC and Fannie Mae to participate in a Consumer Rescue Fund to remediate and refinance predatory loans by providing the consumer a loan they can afford, and which is appropriate for their circumstances.

**Status:** The City of Milwaukee, in conjunction with members of the Milwaukee Foreclosure Partnership Initiative Intervention Workgroup, have recommended that the Wisconsin Housing and Economic Development Authority (WHEDA) identify a source of funds for a loan loss reserve which would leverage additional private funds to create a rescue refinance loan product. This product would serve as a product of last resort for eligible homeowners who have the demonstrated ability to make payments under the terms of the program but who cannot otherwise refinance their loans. The workgroup also recommends that WHEDA seek a revision to State law to allow for the use of bond proceeds to fund refinance mortgages, a statutory change allowed by recent changes to Federal tax law. The workgroup further recommends that WHEDA explore changing the income limits on its property tax deferral loan program in order to assist more homeowners.

### **10) Fund Post-Purchase Counseling**

The City should fund post-purchase counseling services conducted by viable homebuyer counseling agencies, in order to successfully combat predatory loans in Milwaukee. These counseling services assist in preventing foreclosure, as well as educate homeowners about refinancing options for more affordable and suitable loans.

**Status:** The City funds three HUD-certified homebuyer counseling agencies on an annual basis to provide homebuyer assistance for *first-time* low income homebuyers. Besides pre-purchase and post purchase counseling and mortgage loan assistance, funded agencies provide budget counseling, assistance with credit repair, assistance in obtaining home improvement/repair loans, refinancing of existing mortgage loans, tax default and mortgage default counseling.



## **Analysis of Impediments**

### **11) Support for Housing Trust Fund**

The City of Milwaukee should support the development of a local Housing Trust Fund (HTF), a new, ongoing, dedicated source of revenue to support affordable housing. The HTF would be administered by the City and support a wide range of housing. This would include permanent housing services for the homeless, the development and preservation of affordable rental units as well as supporting the creation of new homeowners and preserving the homes of existing homeowners.

**Status:** The Common Council and Mayor of the City of Milwaukee voted to establish a Housing Trust Fund and provided \$2.5 million in bonding to capitalize the Trust Fund. Ongoing revenue from the City budget continues to be one source of funding. Additional revenue sources to maintain the Trust Fund include revenue from: a) Potawatomi gaming proceeds; b) Tax Incremental Financing (TIF) expansion dollars, and; c) Designated PILOT funds.

### **12) Advocate for Open and Inclusive Real Estate and Rental Markets**

The City of Milwaukee should advocate for more open and inclusive home rental and sales markets by working with the housing industry to accomplish the following:

- Work cooperatively with the real estate industry and its trade associations to develop ways for local agents to become more familiar with Milwaukee City neighborhoods. For example, facilitating a relationship between local real estate professionals and community groups to conduct neighborhood tours and other activities to promote stable neighborhoods.
- The City should continue to include MMFHC fair housing presentations as part of its citywide training for rental housing providers.
- The City should continue to have its Housing Authority and Section 8 staff trained by MMFHC on the provisions of fair housing laws and remedies available to their clients.
- Encourage greater efforts on the part of the real estate and rental industries to hire and train minority and bilingual real estate and rental professionals.
- Encourage more active participation by providers of rental housing in local rent assistance programs to expand locational choice for low-income and minority residents

**Status:** Ongoing

### **13) Continue production of Annual Report of Lending Practices in Milwaukee**

The City Office of the Comptroller should continue to produce and distribute its annual report of lending activity in Milwaukee. This report, *City of Milwaukee Annual Review of Lending Practices of Financial Institutions*, has proven to be a valuable resource in analyzing lending patterns.

**Status:** The Milwaukee Common Council adopted legislation requiring the City Comptroller to prepare an annual report on lending practices by area financial institutions. Besides focusing on residential lending practices, the review also compares lending patterns by race and income and compares the racial loan denial rate for Milwaukee with forty-nine other large metropolitan areas in the country. Recommendations are provided for improving residential lending in those areas of the City where homeownership is lowest and annual reviews of the progress that City departments have made in implementing prior report recommendations. This report is undertaken annually and is

## **Analysis of Impediments**

distributed to community-based organizations, lenders and others to help facilitate action on the recommendations.

### **14) *Promote Integrated Neighborhoods through Inclusionary Zoning***

An inclusionary zoning ordinance is a tool designed to increase the economic integration of a community. It is a land use regulation mandating a percentage (usually 15-20%) of the housing units in any project above a given size, be affordable to people of low and moderate incomes. The City (preferably in cooperation with surrounding communities in the region) should work with Milwaukee housing organizations and the local housing industry to research an inclusionary zoning ordinance that produces a maximum of affordable units. The City could research the successful use of such inclusionary zoning in other communities to replicate for use in its jurisdiction. In situations in which an ordinance is unfeasible, the City should incorporate income diversity using affordable housing requirements in housing development agreements, particularly in high-housing cost areas.

**Status:** The City of Milwaukee includes affordable housing and income diversity requirements in its development agreements with housing producers.

### **15) *Outreach to Linguistically Isolated and Bilingual Communities***

The City should facilitate the formation of a partnership with organizations that serve non-English speaking or limited English-speaking persons, to develop a pro-active approach to reach these linguistically isolated populations on fair housing and fair lending issues.

**Status:** The City funds on an annual basis, the Metropolitan Fair Housing Council and the Legal Aid Society, both of whom work with these populations. The City also has partnerships with and funds the following agencies that serve non-English speaking or limited-English speaking persons: *Hmong American Friendship Association, Hmong Wisconsin Chamber of Commerce, Latino Community Center, United Community Center, Hispanic Chamber of Commerce, Lao Family Community, Inc.* In addition, CDBG-funded homebuyer counseling agencies have bilingual staff that works with clients on these issues.

### **16) *Review Zoning Ordinance Regarding Community Living Arrangements***

The City should partner with disability advocacy groups, such as the Wisconsin Coalition for Advocacy, Independence First and others, to review and analyze the Community Living Arrangements section of its zoning ordinance. The language should be reviewed in terms of current and future legal implications and potential liability of the City, as advocates have successfully challenged similar municipal ordinances elsewhere as violations of the Federal Fair Housing Act.

**Status:** Ongoing review of current City ordinances

### **17) *Identify and Overcome Housing Production Impediments***

The City should convene discussions with for-profit and not-for-profit housing producers and lenders regarding impediments to the production of accessible, affordable, and large (4 or more bedrooms) housing units. Further, this consortium should identify the challenges in producing such housing, as well as develop recommendations for policy changes (on the federal, state, and local level). A secondary outcome of this consortium is to educate for-profit developers about current tools

## **Analysis of Impediments**

available for the production of this housing. Lastly, this coordinated approach may be used to encourage for-profit and not-for-profit housing developers to consider partnering on affordable, accessible, and large unit housing projects.

**Status:** Ongoing meetings and discussions by the members of the Housing Trust Fund, Milwaukee Housing Coalition, non-profit and for profit housing producers and housing technical assistance providers.

### **18) Review Milwaukee Public School Policies That Contribute to Segregation**

The City should work with the Milwaukee Public School Board to assess the impact that various MPS policies have on the City and regional racial and economic segregation, particularly Chapter 220, the Neighborhood Schools Initiative, Open Enrollment, and the Milwaukee Parental Choice Program.

**Status:** Members of the Milwaukee School Board are elected by the citizens of Milwaukee. The Milwaukee School Board is a separate, elected and autonomous entity of which the City of Milwaukee has no jurisdiction or authority.

# City of Milwaukee: Affirmative Marketing Plan

**City of Milwaukee**  
**Affirmative Marketing Plan**  
**(for the use of Federal HOME Funds)**

**I. HOME Final Rule 24 CFR 92.351**

The Owner and Managing Agent shall use the affirmative marketing procedures and requirements as specified in the HOME Final Rule 92.351 for *(project name)*.

**II. Policy on Nondiscrimination and Accessibility**

With respect to the treatment of applicants, the Owner and Managing Agent will not discriminate against any individual or family because of race, color, national origin, religion, gender, disability, familial status or presence of children in a household. Reasonable accommodations will be offered to all disabled persons who request accommodations due to disability at any time during the application, resident selection and rent up process. The Owner and Managing Agent shall provide property management staff with all relevant regulations and Fair Housing provisions. All property management staff shall be required to follow the procedures and policies adopted by the Owner and Managing Agent.

**III. Marketing and Outreach**

1. All advertising shall display the Equal Housing Opportunity logo or the phrase "Equal Housing Opportunity."
2. Consistent with the resident population this Development was designed to serve, the marketing of *(project name)* will ensure equal access to appropriate size units for all persons in any category protected by federal, state, and local laws governing discrimination.

Special marketing outreach consideration will be given to the following underserved populations:

- a. African-Americans
- b. American Indians
- c. Hispanics
- d. Asians and Pacific Islanders
- e. Handicapped and Disabled Persons

3. Marketing shall include the use of newspapers of general circulation in *(city or cities)*. The Managing Agent will place notices in newspapers, specialized publications, and newsletters to reach potential residents. Applications, notices, and all publications will include a Fair Housing and Equal Opportunity Logo, and the Accessibility Logo.
4. The Managing Agent will contact local civic and community organizations representative of the ethnic and cultural diversity of the area in order to disseminate information about the Development. Groups representing the handicapped and the elderly will also be contacted. Where necessary and in consultation with the Owner, the Managing Agent will publish its marketing materials in multiple languages in order to better reach potential applicants in the area with language limitations.
5. Other neighborhood-based, nonprofit housing agencies that maintain waiting lists or make referrals for below market rate housing will be contacted, *(i.e., homebuyer counseling agencies, fair housing groups, non-profit organizations)*.

#### **IV. Race and Ethnic Data Collection and Reporting**

Any family who asks shall receive an application package containing the following: Instruction sheet; Application; Income Summary; and form HUD-27061-H "Race and Ethnic Data Reporting Form." The Owner and Managing Agent are required to offer each household member the opportunity to complete the form. Parents or guardians are to complete the form for children under the age of 18. Completed documents for the entire household shall be stapled together and placed in the household's file.

#### **V. Compliance Assessment**

1. The Owner and Managing Agent will review the Affirmative Marketing Plan every five years and update as needed to ensure compliance. The advertising sources will be included in the review to determine if past sources should be changed or expanded.
2. The City of Milwaukee-Participating Jurisdiction (PJ), will obtain the necessary data from the Project sponsor to make a determination on an annual basis on the success of affirmative marketing actions for *(project name)*. If the demographic data of the applicants and residents greatly exceeds the jurisdiction's population data, advertising efforts and outreach will be targeted to underrepresented groups in an attempt to balance the applicants and residents with the demographics of the jurisdiction.

#### **VI. Record Keeping**

1. *{Project name}* shall establish and maintain an Affirmative Marketing file to hold advertisements, flyers, and other public information documents to demonstrate that the appropriate logo and language have been used. Additionally, *{project name}* shall keep records of its activities in implementing the affirmative marketing plan, including other community outreach efforts.
2. The Owner and Managing Agent shall provide HUD and HOME staff access to any pertinent books, documents, papers or other records of their HOME-assisted properties, as necessary, for determining compliance with civil rights and nondiscrimination requirements.

**CITY OF MILWAUKEE, WISCONSIN**  
**Community Development Grants Administration**  
**Affirmative Marketing Policy**

It is the policy and commitment of the City of Milwaukee to ensure that fair and equal housing and economic opportunities are available to all persons, in all housing opportunities and development activities funded by the City, regardless of race, color, religion, gender, sexual orientation, marital status, lawful source of income, familial status, national origin, ancestry, age or mental or physical disability. This is accomplished through a program of education and continuing a working relationship with the Milwaukee Metropolitan Fair Housing Council, the Legal Aid Society of Milwaukee, City of Milwaukee Equal Rights Commission, City of Milwaukee Emerging Business Enterprise Program and other entities.

The City of Milwaukee is committed to providing and promoting racial and economic integration in any housing development or federally assisted program. It undertakes affirmative steps to reach beneficiaries from all racial and ethnic groups, persons with disabilities and families with children and to reach a broad range of income eligible beneficiaries for appropriate housing opportunities.

The City of Milwaukee promotes these goals by the following actions:

- Requiring all properties for sale be listed with a licensed Real Estate Agent and listed on the Multiple Listing Service (MLS).
- Enhance the process to identify available accessible units and marketing them.
- Explore having an Affordable Housing Goal and Target for accessibility. One Target relates to accessible bathrooms (roll in showers; units on ground floor), and others addressed accessibility compliance.
- Quantify the need for accessible units in the City and strive for commensurate baseline accessibility standards for City supported units.
- Include principles of visitability and universal design in all new construction and rehabilitation projects whenever feasible.
- Market rental and homebuyer units, to persons outside the immediate neighborhood to improve diversity, by sending flyers and marketing materials to other non-profit organizations that service those neighborhoods.
- Other marketing methods include:
  - a. Newspaper advertisements
  - b. Open houses
  - c. Homebuyer seminars & informational fairs
  - d. Informational booths at community events



e. WHEDA Open House

In addition, as it pertains to equal opportunity, the City will undertake the following:

- Require subrecipients to maintain records relating to the award of subcontracts. Data will include number of contracts, dollar value, type of service, race and gender of the subcontractor. This information is used to compile the annual HUD 2516 Contractor/Subcontractor report.
- Include the following language in all subrecipient contracts: Utilization of MBE's and WBE's in subcontracts; Section 3 requirements;
- Utilize City-Certified Emerging Business Enterprises in all City contracting activities, requiring an annual goal of 18% of EBE utilization for all contracting departments.
- Ensure that the opportunities in commodity procurement, construction, service orders and professional services are available to small and emerging business
- Maximize support services, contract opportunities, financial resources for potential businesses to compete in the public and private sector markets.
- Work to establish mentor-protégé relationships between small businesses and those in the mainstream marketplace.
- Provide technical and financial assistance as it pertains to business expansion and overall development in certain areas.
- Provide a resource list with information on business training and educational programs with various institutions and organizations.
- Certify minority and women business enterprises to enhance their ability to compete in the public and private sector markets.
- Maintain a directory of all City-certified EBEs and WBEs.

# City of Milwaukee: Resale and Recapture Policy

## RESALE AND RECAPTURE POLICY

If the participating Jurisdiction (PJ) will use HOME funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

The HOME program provides financial assistance for income eligible households to acquire housing through homeownership activities. Homeownership funding will be provided to local governments working with non-profit organizations to provide loans to income eligible households that are secured by for the duration of the period of affordability. Interested entities intending on using HOME funds for financial assistance activities must adhere to laws which prohibit discrimination in housing and special outreach efforts should be implemented to attract minorities and other protected classes in the homebuyer pool. Additional information and guidance can be found in the Housing Policy Manual.

In order to apply resale and recapture provisions appropriately, the HOME program requires grantees to structure their homebuyer assistance programs based on local market conditions, geographical constraints, and their target market. Therefore, applicants must submit reasonable justification for carrying out homebuyer activities based on local market conditions, geographical constraints, target market and other factors in the housing market where funds will be targeted. Additionally, applicants must select either the resale provision or the recapture provision (except for projects carried out in the NRSA's which will utilize the Presumption of Affordability) for the target area and submit a Resale/Recapture Plan and Procedures as to how the selected provision will be implemented through procedures that must include informing beneficiaries, documenting compliance through the period of affordability. Successful applicants will adopt and implement these provisions as a method of securing the investment of HOME funds for all homebuyer assistance activities.

The City will primarily use Recapture Provisions for all its homebuyer activity, except in cases where the Resale Provisions are required, or when the Presumption of Affordability is requested (within NRSA's) for a particular project in advance. Recapture and Resale Provisions are clearly defined in the contract between the City and all subrecipients. It is enforced with an active covenant that is secured by a mortgage at time of closing, to ensure affordability of units developed with HOME funds.

Successful applicants must include the following, at a minimum, in the development and implementation of the Resale/Recapture Plan and Procedures, but can elect to be more restrictive if justification is provided that market conditions warrant such restrictions.

1. Every homebuyer (original or subsequent homebuyer) must be determined income eligible according to the HUD income limits at the time of sale (income limits are available online);

2. HUD approved homebuyer counseling courses have been completed prior to any HOME-assisted acquisition from occurring;
3. Property that is assisted with HOME funds to be purchased may be newly constructed or existing "for sale" property, to be rehabilitated;
4. The initial buyer must reside in the home as his/her principal residence for the duration of the period of affordability, as agreed to in the HOME Regulatory Agreement;
5. Resale or recapture provisions must be secured by a legal mechanism, such as a deed restriction, land covenant, or other similar legal instrument, throughout the period of affordability;
6. A resale or recapture provision is triggered by any voluntary or involuntary transfer of title during the period of affordability, or if recipients of HOME subsidies fail to maintain the HOME-assisted unit as their primary residence;
7. The purchase price or sales price must be determined at fair market value, typically through an appraisal, and made affordable taking into account market conditions. "Affordable" is defined as a maximum percentage, not to exceed 33 percent, of the purchaser's gross income that can be used to pay the fixed costs of owning a home (i.e., loan payments of principal and interest, taxes, and insurance, typically referred to as PITI); and
8. All HUD regulatory requirements must be followed according to the Housing Production Guide.

## PERIOD OF AFFORDABILITY

The HOME rule at §92.254(a)(4) establishes the period of affordability for all homebuyer housing. How to calculate the amount of HOME assistance in each unit and therefore the applicable period of affordability varies depending on whether the unit is under resale or recapture provisions.

### a. Period of Affordability Under Resale Provisions

Under resale, §92.254(a)(5)(i) of the HOME rule states that the period of affordability is based on the *total* amount of HOME funds invested in the housing. Any HOME program income used to assist the project is included when determining the period of affordability under a resale provision.

### b. Period of Affordability Under Recapture Provisions

For HOME-assisted homebuyer units under the recapture option, the period of affordability is based upon the *direct HOME subsidy* provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability. The following table outlines the required minimum affordability periods.

If the total HOME investment (resale) or direct subsidy (recapture) in the unit is:	The period of affordability is:
Less Than \$15,000	5 years
Between \$15,000 and \$40,000	10 years
More Than \$40,000	15 years

### ***Restrictions that terminate upon occurrence of any of the following termination events:***

foreclosure, transfer in lieu of foreclosure or assignment of an FHA insured mortgage to HUD will be handled on a case-by-case basis to ensure that if possible resale and recapture provisions are carried out. Purchase options, rights of first refusal or other preemptive rights to purchase the housing before foreclosure to preserve affordability may be implemented by the grantee to protect the original investment of HOME funding.

## RESALE PROVISIONS

The *HOME resale requirements* are established in the HOME rule at §92.254(a)(5)(i). Under HOME resale provisions, the City will ensure that, when a HOME-assisted homebuyer sells his or her property during the affordability period,

1. The property is sold to another low-income homebuyer who will use the property as his or her principal residence;
2. The original homebuyer receives a fair return on investment, (i.e., the homebuyer's down payment plus capital improvements made to the house); and
3. The property is sold at a price that is "affordable to a reasonable range of low-income buyers."

*If the City only provides HOME assistance to develop the unit and HOME funds are not used to lower the purchase price from fair market value to an affordable price, resale provisions must be used.*

#### **Ensuring Long term Affordability**

The HOME Rule at §92.254(a)(3) requires that all HOME-assisted homebuyer housing be acquired by an eligible low-income family, and the housing must be the principal residence of the family throughout the period of affordability. If the housing is transferred, voluntarily or otherwise, during the period of affordability, it must be made available for subsequent purchase only to a buyer whose family qualifies as low-income, and will use the property as its principal residence. The HOME resale provisions must enforce these requirements as any housing assisted with HOME funds must remain affordable for the duration of the period of affordability.

#### **Fair Return on Investment**

The City's resale requirements will ensure that, if the property is sold during the period of affordability, the price at resale provides the original HOME-assisted homebuyer a fair return on investment (including the original homebuyer's initial investment and certain capital improvements).

#### **Presumption of Affordability**

In certain neighborhoods (NRSA's), housing can be presumed to provide a fair return to an original homebuyer upon sale, to be available and affordable to a reasonable range of low-income homebuyers, and to serve as the primary residence of a low-income family during the period of affordability. In such cases, the City will not impose resale restrictions because the characteristics of the neighborhood make it probable that these requirements will be met without the imposition of the restrictions. Instead, §92.254(a)(5)(i)(B) of the HOME rule states that the City may identify certain neighborhoods with housing and income conditions that will:

1. Provide ongoing affordable home prices,
2. Ensure that the sales price of a home will provide a fair return to the original homebuyer, and
3. Provide a pool of income-eligible homebuyers from the residents of the neighborhood.

## RECAPTURE PROVISIONS

The HOME recapture provisions are established at §92.253(a)(5)(ii), and unlike the resale approach, permit the original homebuyer to sell the property to any willing buyer during the period of affordability while the City is able to recapture all or a portion of the HOME-assistance provided to the original homebuyer.

*Recapture provisions cannot be used when a project receives only a development subsidy and is sold at fair market value, because there is no direct HOME subsidy to recapture from the homebuyer. Instead, resale provisions must be used.*

### Recapture Method

In the event of a voluntary or involuntary transfer of the property during the applicable period of affordability, the City will recapture all or a portion of the direct subsidy provided to the homebuyer. This direct subsidy is provided in the form of a deferred payment 0% interest loan. The loan will be forgiven prorata over the period of affordability (i.e., generally 5 years), as long as the home remains the principal residence of the home buyer. If the net proceeds from a voluntary or involuntary sale are insufficient to repay the prorated amount of the HOME subsidy, The City shall recapture the balance due on the loan or 100% of net proceeds from the sale, whichever is less. If there are no net proceeds from the sale, no repayment is required. Net proceeds are defined as the sales price minus superior loan repayment and any closing costs incurred by the homebuyer.

HOME assisted units under Recapture Provisions should be sold at a reasonable fair market value. Recapture provisions may include the following mechanisms, or a combination thereof:

1. Recapture the entire amount of the HOME investment;
2. Recapture a portion of the HOME investment only if the grantee's Resale/Recapture Plan and Procedures include prorated forgiveness throughout period of affordability. This means that the amount of funds recaptured is based on a predetermined pro-rata portion of the original HOME subsidy based on the length of time the HOME beneficiary occupied the assisted unit; and
3. Shared net proceeds from the sale if market conditions justify insufficient sales price to recapture the full amount of the HOME investment and only if the grantee's Resale/Recapture Plan and Procedures include this provision. The HOME grant administration manual has additional information to implement this recapture provision.